

CHAPTER 8: REVIEW OF THE ‘B’ ALTERNATIVES – NCCP/MSAA/HCP AVOIDANCE AND MINIMIZATION MEASURES AT THE SUB-BASIN LEVEL

SECTION 8.1 THE ANALYTIC FRAMEWORK FOR THE REVIEW OF NCCP/MSAA/HCP ALTERNATIVES IN CHAPTERS 8 AND 9

As reviewed in *Chapter 6*, the NCCP/MSAA/HCP planning process has included the formulation of a broad range of Alternatives so that different conservation strategies can be fully considered. These conservation strategies have been embodied in the set of ‘B’ Alternatives formulated to address the conservation goals set forth in *Chapter 2*. Other programmatic alternatives required by law have also been considered that were not formulated to address the conservation goals for the subregion set forth in *Chapter 2*. The formulation of alternatives considered during the course of the coordinated planning process and the rationale for rejecting several of the alternatives from further consideration are presented in *Chapter 6*. The rationale for selecting alternatives to be further considered is also presented in *Chapter 6*.

Alternatives considered in this Chapter reflect both legal mandates derived from relevant statutes and the Project Purposes set forth in *Chapter 2*. With regard to statutory mandates, Section 10 of FESA requires an applicant for a Section 10(a)(1)(B) permit authorizing Take of listed species to prepare and submit “a conservation plan that specifies –

...

(iii) what alternative actions to such taking the applicant considered and the reasons why such alternatives are not being utilized;”

(FESA Section 10(a)(2)(A)(iii))

As reviewed previously, the requirements of FESA Section 10(a)(1)(B) have been integrated with the provisions of the NCCP Act, including the Statewide NCCP Process and Conservation Guidelines, pursuant to the FESA Section 4(d) Special Rule (“4(d) Rule”) for the coastal California gnatcatcher. A reasonable range of alternatives must be considered both to comply with FESA and with the requirements of CEQA and NEPA.

Based on the planning considerations identified and the protection, management and restoration recommendations presented in *Chapters 4* and *5*, it is clear that Habitat Reserve design and HRMP conservation planning considerations associated with the ‘B’ Alternatives need to be examined at **both a *sub-basin* scale and a *planning area* scale** in order to provide an assessment of Alternatives that incorporates geographic-specific and landscape-level review criteria. Three elements of the Draft Southern Planning Guidelines and Draft Watershed Planning Principles presented in *Chapters 4* and *5* provide for review criteria at both a geographic-specific and a landscape level:

- **Species Accounts:** The “Species Accounts” are analyses of significant populations of listed species and other sensitive planning species found within the study area and the broader NCCP/MSAA/HCP planning subregion.
- **Draft Southern Planning Guidelines and Draft Watershed Planning Principles:** The Sub-Basin Scale Planning Considerations in the Draft Southern Planning Guidelines for the Southern NCCP/MSAA/HCP and Sub-Basin Planning Considerations in the Draft Watershed Planning Principles are geographic-specific analyses of significant resources found within the study area, including planning, management and restoration recommendations for protecting specific resources (both species and physical resources).
- **NCCP and SAMP Landscape Scale Guidelines and Principles:** The NCCP/MSAA/HCP Planning Area Tenets and Principles (Section 2 of the Draft Southern Planning Guidelines) and the Watershed Level Planning Tenets and Principles (Section 1 of the Draft Watershed Planning Principles) are broad conservation planning/resource protection principles intended to guide and assess the assemblage of larger scale open space/habitat areas and to help define long-term prescriptions for managing these lands in order to maintain habitat value.

Each of these elements is briefly reviewed below in order to provide a framework for the analyses presented in *Chapters 8 and 9*.

8.1.1 Species Accounts

As reviewed previously, “planning species” have been selected to serve as “conservation planning surrogates” under the NCCP/MSAA/HCP and SAMP programs to help define which portions of the study area should be protected over the long term. By documenting the populations and distribution of planning species within the study area, those areas potentially important for inclusion in a future Habitat Reserve can be identified.

The selected planning species comprise the listed species found within the NCCP planning area as well as a wide range of other sensitive plant and animal species, including all CNPS List 1B and List 2 sensitive plant species known from the NCCP planning area. The Draft Southern Planning Guidelines and Draft Watershed Planning Principles indicate that it is important to assess potential impacts on planning species both in terms of their importance as sensitive species and in terms of their importance as conservation planning surrogates for considering lands to be included in a Habitat Reserve.

For the above reasons, the Draft Southern Planning Guidelines have attempted to define significance criteria for populations and locations of planning species. As described in *Chapter 4* of this NCCP/MSAA/HCP, the Draft Southern Planning Guidelines describe the elements of

the analyses that were used to determine the significance of planning species populations in particular locations:

“In order to prepare and implement sub-basin guidelines for NCCP/MSAA/HCP planning species, it is necessary to gain an understanding of each of the species’ regional and subregional distribution, specific habitat affinities...and the life history characteristic of each species. In this context, the following issues need to be addressed:

- The species’ regional and subregional distribution;
- The relative importance of the Southern Subregion for the continued survival or recovery of the species;
- Key and important habitat characteristics of the species;
- Key and important life history characteristics; and
- Response to management (including enhancement and restoration).

With the above information, *major populations* and *important populations* of the planning species are identified. *Major populations* are those considered sufficiently large to be self-sustaining with a minimum of active or intensive management intervention or that at least support enough breeding individuals to contribute reliably to the overall metapopulation stability of the species. *Important populations* may not meet the relative size standards of *major populations*, but may nonetheless be important to the species’ long-term survival. For example, a smaller population in a key habitat linkage may be important for breeding success and exchange of genetic material and thus would be considered to be an *important population*, even though it would not be considered a *major population*."

To facilitate reserve design, *key locations* are defined for some planning species. The identification of a *key location* within a *major* or *important population* ***defines that portion of the population that is necessary for conservation of the species in the subregion.***

Thus, areas designated as *key locations* are considered habitat areas essential to the long-term conservation of the particular species and constitute areas where impacts should be avoided or otherwise minimized as specified in the Draft Southern Planning Guidelines.

8.1.2 NCCP and SAMP Sub-Basin Guidelines and Principles—Consistency with Geographic-Specific Avoidance and Minimization Review Criteria

The Species Accounts, as well as other information based on extensive field surveys and scientific review, were carried forward into the preparation of geographic-specific Draft

Southern Planning Guidelines and Draft Watershed Planning Principles in *Chapters 4* and *5* that identify significant resources within each sub-basin found within the study area. These draft sub-basin guidelines and principles both identify significant resources and prescribe measures for protecting, managing and restoring these resources. Accordingly, these geographic-specific sub-basin guidelines and principles provide a comprehensive set of measures and standards for assessing potential biological impacts to species, habitats, and important hydrologic and geomorphic processes that shape and affect habitat systems. The Draft Southern Planning Guidelines and Draft Watershed Planning Principles are applied in *Chapter 8* to assess, from an area-specific perspective, the extent to which the ‘B’ Alternatives avoid or minimize impacts to species and habitats and to important hydrologic and geomorphic processes. The *Chapter 8* analyses become analytic “building blocks” for the broader landscape-level review undertaken in *Chapter 9*.

8.1.3 Use of NCCP and SAMP Landscape-Scale Guidelines–Consistency with Landscape Level Guidelines and Principles

The NCCP and SAMP landscape-level tenets and principles have been formulated to guide large-scale planning for potential Habitat Reserve lands and the preparation of a HRMP. The NCCP SRP/Science Advisors Tenets of Reserve Design, the SAMP Tenets and the Baseline Conditions Watershed Planning Principles provide guidance regarding the formulation and assessment of alternative Subregional Conservation Strategies directed toward the attainment of the NCCP/MSAA/HCP conservation goal of maintaining and enhancing “net habitat value over the long term” within the study area. These three sets of landscape level Tenets and Planning Principles will be employed in *Chapter 9* to assess the extent to which the ‘B’ Alternatives and programmatic Alternatives required by law provide for: (1) the creation of a Habitat Reserve that includes blocks of habitat containing all major habitat types found within the planning area in a manner consistent with the landscape scale guidelines and (2) implementation of a funded HRMP, including adaptive management measures designed to protect and enhance habitat values over the long term.

Chapter 9 builds on the sub-basin analyses presented in this *Chapter 8* by analyzing, from a broad planning area policy perspective, avoidance, minimization and mitigation under the ‘B’ Alternative Habitat Reserve designs in relation to the fundamental NCCP planning principles – the SRP Tenets of Reserve Design (including the Science Advisors “principles” of reserve design), the SAMP Tenets and the Baseline Conditions Watershed Planning Principles.

SECTION 8.2 THE ANALYTIC FRAMEWORK FOR THE CHAPTER 8 REVIEW OF THE ‘B’ ALTERNATIVES

FESA requires a consideration of minimization and mitigation actions in conjunction with the review of Alternatives to Take of species and loss of associated habitats. The NCCP Act, which is subject to CEQA, is also required to analyze avoidance, minimization and mitigation in conjunction with the review of Alternatives that would avoid or substantially reduce significant environmental effects. The NCCP program, and the Southern NCCP/MSAA/HCP in particular, have a broad subregional planning framework that requires analytic approaches to avoidance/minimization and mitigation which reflect the conservation planning concepts and large geographic scale of NCCP planning. As reviewed in *Section 8.1*, this Chapter focuses on avoidance and minimization associated with each of the Habitat Reserve Alternatives at the sub-basin scale using the *Chapter 4* and *5* sub-basin guidelines and principles as the substantive review policies. In addition to the *Chapters 4* and *5* sub-basin guidelines and principles, the analysis also factors in avoidance and minimization measures that have been incorporated into prior environmental documentation, namely the GPA/ZC Final Environmental Impact Report (GPA/ZC EIR) adopted by the County of Orange or the draft SAMP Environmental Impact Statement (SAMP EIS) recently distributed by the USACE.

SECTION 8.3 ANALYSIS OF CONSISTENCY OF THE HABITAT RESERVE ALTERNATIVES WITH THE DRAFT SOUTHERN PLANNING GUIDELINES AND DRAFT WATERSHED PLANNING PRINCIPLES

8.3.1 Consistency Analysis Methodology for the Review of the A-5 Alternative and the ‘B’ Alternatives

The Habitat Reserve Alternatives reviewed in this section are those Alternatives intended to address the purposes of FESA and the NCCP Act (Alternatives B-8, B-10M and B-12), and the “No Take” Alternative (A-5 Alternative) required pursuant to FESA. Other programmatic Alternatives not directed toward the joint FESA/NCCP purposes as set forth in the 4(d) Rule for the California gnatcatcher are reviewed in *Chapter 9*, along with the Alternatives reviewed in this *Section 8.3*.

Due to the wide-range of sub-basin planning considerations and recommendations set forth in *Chapters 4* and *5*, it is important to understand how the specific sub-basin Planning Guidelines and Watershed Principles apply to individual Alternatives, and how they comparatively relate to each of the other Alternatives reviewed in *Chapter 8*. A matrix approach has been selected as the most effective and “user-friendly” means of presenting a comparative analysis of the different Alternatives. *Table 8-1* presents a matrix that provides “Draft Southern Planning Guidelines Consistency Findings.” Specific recommendations are set forth for each sub-basin,

followed by a “consistency analysis” for each Alternative that is presented side-by-side in relation to the particular recommendation. In this way, each of the recommendations for a particular sub-basin is presented sequentially in the left hand column of the Consistency Matrix both in the context of the sub-basin and in relation to each of the Alternatives. *Table 8-2* presents a matrix that provides the “Draft Watershed and Sub-Basin Planning Principles Consistency Findings” using the same approach described for *Table 8-1*. Text summaries of the consistency analysis results are provided for each Alternative reviewed. *Table 8-3* provides an overall conservation summary for the planning species in terms of locations, suitable habitat, *major* and *important populations* and *key locations* for the ‘B’ Alternatives based on the Species Accounts. Building on the above tables, a narrative summary of consistency determinations is provided for each of the Alternatives. Four consistency finding categories are used:

1. **Consistent** means that the Alternative would be fully consistent with the sub-basin Planning Guideline or Watershed Principle and would require no modification of the proposed Alternative. A “Consistent” determination may also depend on implementation of avoidance measures that have been incorporated into the GPA/ZC EIR adopted by the County of Orange, proposed by the USACE in the draft SAMP EIS or proposed as part of this NCCP/MSAA/HCP. Where consistency is dependant on avoidance measures, these measures are so noted in the analysis.
2. **Could be Consistent** means that the Alternative is not fully consistent with the sub-basin recommendation but would be consistent if the specified conditions or performance criteria are implemented. For example, revisions to the Alternative or further avoidance or minimization measures might be required in order to make a final determination of “consistent” with the sub-basin Guideline or Principle (*e.g.*, whether the feasibility of minimization of impacts on areas such as southwestern pond turtle foraging habitat areas would require further analysis).
3. **Not Consistent** means that the Alternative would not be consistent with one or more substantive provisions of a particular sub-basin Planning Guideline or Watershed Principle.
4. **Not Applicable** means that the sub-basin Planning Guideline or Watershed Principle would not be relevant to, or necessary in, the sub-basin (*e.g.*, the B-8 Alternative proposes no development in the Chiquita sub-basin and therefore cowbird trapping would not be necessary).

The concluding section of this *Chapter 8* provides a series of narrative analyses of Circulation System Consistency for each sub-basin for each of the ‘B’ Alternatives (the A-5 Alternative assumes the existing RMV ranch road network would act as the circulation system). It is important to note that, due to the complexity of preparing infrastructure plans for such a wide range of alternatives, the comparative conservation and impact acreages cited in the consistency

determinations for the Alternatives do not include impacts related to the construction and maintenance of infrastructure such as new water and sewer lines, lift stations, pump stations, reservoirs, etc. Potential infrastructure impacts (other than circulation systems analyzed in *Chapter 8*) are not considered to be of sufficient overall significance to substantially affect the landscape level reviews in *Chapter 9*. For the Alternative identified in *Chapter 9* for further analysis in *Chapters 13* and *14*, a detailed impact analysis is prepared in order to quantify circulation/infrastructure impacts of the Alternative.

The Draft Southern Planning Guidelines enumerated in *Table 8-1* do not include Guidelines that were originally prepared for intermediate mariposa lily (*Calochortus weedii* var. *intermedius*), a CNPS List 1B planning species (see Species Accounts in *Appendix E*). Intermediate mariposa lily was excluded as a planning species for this analysis because of the uncertain taxonomic relationship of the two varieties *C. weedii intermedius* and the more common Weed's mariposa lily (*C. weedii weedii*) in the planning area.¹ As a result Guidelines 10, 11, 23, 24, 36, 47 48, 63, 64, 73, 99, 100, 129, and 140 are omitted from the table and not included in the analyses.

The Draft Southern Planning Guidelines in *Table 8-1* also omit two Guidelines (57 and 69) that relate to the relocation of the Ortega Highway to the north of San Juan Creek because this relocation is no longer being proposed under any of the Alternatives. Under all of the 'B' Alternatives Cow Camp Road would be constructed north of San Juan Creek, but existing Ortega Highway would remain in service. Because the number of trips generated on Ortega Highway is anticipated to be reduced as a result of a new Cow Camp Road, there would be beneficial effects on the movement and dispersal of wildlife and use of upland habitats south of San Juan Creek by species such as the arroyo toad. These effects are also discussed in the Circulation Systems Consistency Analysis presented in *Section 8.3.4*.

Although several Guidelines have been dropped from the consistency analysis, the original numbering system for the Guidelines is retained in *Table 8-1* and the narrative analyses presented below.

8.3.2 Summary of the Sub-basin Consistency Analyses

In describing the application of the NCCP Reserve Design Tenets to the analysis of Alternatives, the NCCP Science Advisors noted that "reserve design Principles are not absolutes and "... it may be impracticable or unrealistic to expect that every design Principle will be completely

¹ Studies conducted by GLA in 2003 (unpublished data) on the varieties of *C. weedii* show that the two varieties intergrade and hybridize in the planning area. A north to south gradient occurs within the planning area with a stronger influence of *C. w. intermedius* in the foothill and coastal areas to the north and west of the planning area and a stronger influence of *C. w. weedii* to the south and east towards Camp Pendleton and the Cleveland National Forest. Hybrids of the two varieties occur in four main areas on RMV: Chiquita Canyon/Chiquadora Ridge, Gobernadora east of the creek/northern Central San Juan Creek, Cristianitos Canyon/southern Trampas Canyon, and La Paz Canyon.

fulfilled throughout the subregion” (Science Advisors 1998). The following is a summary of the consistency analysis set forth in *Tables 8-1* and *8-2*. The reader is strongly encouraged to read *Tables 8-1* and *8-2* in full in order to have a complete understanding of the consistency analyses and to review the text in *Chapters 8* and *9* discussing key issues that differentiate the Alternatives.

a. Alternative A-5

1. Southern Planning Guidelines Consistency Analysis

Alternative A-5 is 45 percent (67/148 total) consistent with the Draft Southern Planning Guidelines. Modifications would be necessary to achieve consistency with Guidelines 17, 21, 22, 42, 61, 74, 80 and 143, the “Could be Consistent” findings. Alternative A-5 is 49 percent “Not Consistent” with the Draft Southern Planning Guidelines (72/148 total).

For the “Could be Consistent” findings for Guidelines 17, 21, 22, 42, 61, 74, 80 and 143, Guideline 17 relates to the protection of 80 percent of the *major population* of gnatcatchers which A-5 achieves but habitat value loss is likely due to fragmentation and edge effects. Guidelines 21, 22 and 61 relate to the translocation of dudleya which could be required as a CEQA mitigation measure. The EIR/EIS will examine this issue in more detail. Guideline 42 relates to protection of downstream habitat for aquatic species in Gobernadora and San Juan creeks by implementing water quality management measures. Guideline 80 relates to protecting Verdugo Canyon hydrology and coarse sediment transport by setting back development from regulated waters. Guidelines 74 and 143 relate to maintenance of stormwater flows and management of water quality. Given the low intensity of proposed development associated with the A-5 Alternative and the requirements contained in the County of Orange/San Diego RWQCB MS4 permit, these modifications are considered feasible.

For the “Not Consistent” findings, as noted above, Alternative A-5 is 49 percent “Not Consistent” with the Draft Southern Planning Guidelines. This substantial percentage of inconsistencies is related to the purpose of the A-5 Alternative. As described in *Chapter 6*, A-5 is a required Alternative under FESA, CESA, CWA and state policy that avoids regulated waters and listed species. A-5 is not intended to be consistent with the Draft Southern Planning Guidelines and assumes no NCCP/MSAA/HCP or SAMP. Consequently A-5 has a low degree of consistency with the Guidelines and the lack of an NCCP/MSAA/HCP and SAMP under the A-5 Alternative is a significant limitation for overall reserve design.

2. Watershed Planning Principles Consistency Analysis

Alternative A-5 is 28 percent (11/40 total) consistent with the Planning Principles. Modifications would be necessary to address five principles (5, 6, 16, 20, and 23) for which it could be consistent. Alternative A-5 is 60 percent (24/40 total) “Not Consistent” with the Planning Principles.

For the A-5 Alternative, “Could be Consistent” findings (the types of modifications necessary to address Principles 5, 6, 16, 20 and 23) are all related to the treatment of water quality and storm flow management. Given the low intensity of proposed development associated with the A-5 Alternative and the requirements contained in the County of Orange/San Diego RWQCB MS4 permit, these modifications are considered feasible.

Alternative A-5 is 60 percent “Not Consistent” with the Planning Principles, a low degree of consistency. This significant number of inconsistencies is a result of the purpose of the A-5 Alternative as a No Take/No SAMP Alternative and the land configuration required to avoid jurisdictional areas and listed species (*e.g.*, limited buffers, habitat fragmentation, and impacts on sources of coarse sediments).

b. Alternative B-8

1. Southern Planning Guidelines Consistency Analysis

Alternative B-8 is 70 percent (103/147 total) “Consistent” with the Draft Southern Planning Guidelines. Modifications would be necessary to address 38 (25 percent) Guidelines where it is “Could be Consistent.” B-8 is “Not Consistent” with four (3 percent) Guidelines (30, 54, 65 and 68).

Regarding the consistent determinations, several determinations rely on the implementation of avoidance and/or minimization measures that were incorporated in either the GPA/ZC EIR, the draft SAMP EIS or proposed in this NCCP/MSAA/HCP as identified in *Table 8-1*.

For the “Could be Consistent” findings, the types of modifications and considerations that would be necessary include a determination as to the availability of funding to support implementation of multiple elements of the Adaptive Management Program (AMP) component of the HRMP. With regard to available funding, as discussed in further detail in *Chapter 9* of the NCCP/MSAA/HCP and in the EIR/EIS, B-8 primarily is an Alternative developed by the environmental community directed towards large-scale public acquisition of RMV lands in combination with very limited development in specified areas. The availability of funds for implementation of the AMP as a consequence of the relatively limited development areas is

uncertain. With correspondingly fewer residential units generating annual AMP funds and the limited regulatory “nexus” potentially resulting in lower fees per unit, the annual management fees are not determinable at this time, and therefore funding the AMP is not considered feasible at this time. The inability to predict funding is significant in terms of overall reserve design and long-term function.

For the “Not Consistent” findings, Alternative B-8 conflicts with Guideline 65 regarding the protection of the Radio Tower Road vernal pool and the Riverside and San Diego fairy shrimp on the Radio Tower Road mesa, Guideline 30 regarding minimizing impacts to native grasslands in the Gobernadora sub-basin, Guideline 54 regarding protecting foraging habitat for raptors in the Central San Juan subunit and Guideline 68 regarding wildlife movement through linkage K located south of the artificial lake in Trampas Canyon. Alternative B-8 will conserve 12,276 acres or 74 percent of grassland habitat; a conservation level sufficient to include grassland as a covered habitat type under the NCCP, as discussed in *Chapter 13*. Conservation of raptor nesting locations is approximately 85 percent and foraging habitat varies from 73 percent of grassland and barley field agriculture (foraging habitat for golden eagle and merlin) to 85 percent riparian/woodland (foraging habitat for Cooper’s hawk). The constraint of linkage K is common to all Alternatives. The Planning Guideline conflicts associated with Alternative B-8 are not significant in terms of overall reserve design for the majority of planning species and their habitats, but are in conflict with the protection of two listed planning species: the Riverside and San Diego fairy shrimp. Avoidance of the vernal pool supporting these two species on the portion of Radio Tower Road mesa within the Trampas Canyon development area is not considered feasible because of the reduced available development acreage under this Alternative.

2. Watershed Planning Principles Consistency Analysis

Alternative B-8 is 62 percent (20/32 total) “Consistent” with the Draft Watershed Planning Principles and 3 percent “Not Consistent.” Modifications would be necessary to the B-8 Alternative to achieve consistency with Principles 7, 9, 13, 14, 25, 27, 30, and 31 for which it is “Could be Consistent.”

For the “Could be Consistent” findings, Principles 7, 9, 13, 14, 25, 27, 30 and 31 identify funding to support implementation of the AMP, including implementation of the Habitat Restoration Plan, long-term control of invasive species, and stabilization/restoration of areas generating fine sediments in the San Mateo Creek Watershed. The availability of funds for implementation of the AMP as a result of the limited regulatory “nexus” under the B-8 Alternative cannot be determined at this time. Therefore, to ensure adequate funding is considered speculative. The inability to ensure funding of the AMP is significant in terms of overall aquatic resource conservation area design and long-term function. Additional feasibility

considerations relating to funding required to assure the long-term protection of aquatic resources are reviewed in the following section.

For the “Not Consistent” findings, the three conflicts associated with the B-8 Alternative relate to proposed development in the valley floor and alluvial side canyons in the Gobernadora sub-basin (Principle 10), the impact on a vernal pool supporting fairy shrimp on the Radio Tower Road mesa (Principle 19), and the continued generation of fine sediments from erodible clay soils in the Cristianitos Sub-basin (Principle 26). The lack of consistency with Principle 10 regarding the valley floor and alluvial side canyons in Gobernadora is common to all Alternatives and is not a significant reserve design issue. Avoidance of the vernal pool supporting fairy shrimp on the portion of Radio Tower Road mesa within the Trampas Canyon proposed development area is not considered feasible because of the reduced available development acreage under this alternative scenario; this is a significant reserve design issue. The continued generation of fine sediments in the Cristianitos sub-basin, if restoration is not undertaken, is a potentially significant aquatic resource conservation area design issue as it may affect downstream resources.

c. Alternative B-10M

1. Southern Planning Guidelines Consistency Analysis

Alternative B-10M is 86 percent (127/148) “Consistent” with the Draft Southern Planning Guidelines (*Table 8-3*). Revisions to the B-10M would be necessary in five (3 percent) instances would necessary to achieve consistency with Guidelines 4, 17, 42, 74 and 91 where it is “Could be Consistent.” Alternative B-10M is “Not Consistent” with 16 (11 percent) of the Guidelines.

Regarding the consistent determinations, several determinations rely on the implementation of avoidance and/or minimization measures that were incorporated in either the GPA/ZC EIR, the draft SAMP EIS or proposed in this NCCP/MSAA/HCP as identified in *Table 8-1*.

With regard to the “Could Be Consistent” findings, the types of modifications that would be necessary for B-10M to be consistent with Guidelines 4, 17, 42, 74 and 91: (1) development of a golf course in the Chiquita sub-basin (Planning Area 2) that would protect foraging habitat for raptors; (2) creation of a golf course/development footprint in the Chiquita sub-basin (Planning Area 2) that would minimize fragmentation and loss of habitat value for the gnatcatcher; (3) development of a golf course design in the Cristianitos sub-basin (Planning Area 7) that would avoid the thread-leaved brodiaea location of 120 flowering stalks in that sub-basin; and (4) implementation of stormwater and water quality management measures.

Rancho Mission Viejo has indicated that modifications “1” and “2” are not feasible under the B-10M Alternative. Modification “3” appears to be feasible in that this involves discrete design decisions regarding the golf course in Planning Area 7. Modification “4” is also feasible based on implementation of the Water Quality Management Plan (WQMP).

For the “Not Consistent” findings, Alternative B-10M generally conflicts with the Draft Southern Planning Guidelines in four ways: (1) impacts to native grasslands; (2) impacts to raptor foraging habitat; (3) limited impacts to specific species and habitat types; and (4) impacts to wildlife movement, particularly along San Juan Creek. Alternative B-10M would conserve 10,355 acres or 68 percent of grassland habitat. However, B-10M is not consistent with Guideline 125 which recommends minimization of impacts to native grasslands in the lower Gabino and Blind Canyons subunit; 39 percent of native grassland in the subunit would be impacted under B-10M. Conservation of historic raptor nesting locations is approximately 80 percent and conservation of foraging habitat varies from 64 percent for grassland and barley field agriculture (foraging habitat for golden eagle and merlin) to 82 percent for riparian/woodland and forest (foraging habitat for Cooper’s hawk). However, B-10M would not be consistent with Guideline 126, which recommends protection of breeding and foraging habitat in the lower Gabino and Blind Canyons subunit; breeding and foraging habitat in Blind Canyon would be impacted. Although the conservation of 57 percent of coastal sage scrub and 68 percent of gnatcatcher locations along the eastern slopes of Chiquadora Ridge fails to achieve the 80 percent conservation threshold recommended by Guideline 39 for this location, overall Alternative B-10M would protect 87 percent of gnatcatcher locations and 89 percent of coastal sage scrub within the *major population/key location* in the Chiquita/Wagon Wheel sub-basins and Chiquadora Ridge portion of the Gobernadora sub-basin, and is therefore consistent with Guideline 17. Across the entire permanent open space, B-10M would conserve 81 percent of coastal sage scrub and 79 percent of gnatcatcher locations (16,798 acres and 579 locations, respectively). Alternative B-10M would protect all important habitat linkages and wildlife corridors except linkage J along San Juan Creek as noted above and linkage K located south of the artificial lake in Trampas Canyon (which is impacted by all the Alternatives).

Overall Alternative B-10M achieves a high degree of consistency with the sub-basin protection, management and restoration recommendations.

2. Watershed Planning Principles Consistency Analysis

Alternative B-10M is 80 percent (33/40 total) “Consistent” with the Draft Watershed Planning Principles. Revisions to the B-10M Alternative would be necessary to achieve consistency with Principles 35, and 36 for which it is “Could be Consistent.” Alternative B-10M is “Not Consistent” with five (12 percent) of the Principles (8, 10, 19, 21, 25, 40).

With regard to “Could be Consistent” findings, consistency with Principles 35 and 36 could be attained by design and construction of a collector road over Cristianitos Creek that would avoid significant riparian habitat, arroyo toad breeding habitat, and avoid altering stream course morphology. Upgrading existing Cristianitos Road to County standards would require the removal of the existing at-grade Arizona style (pipe and concrete) crossing of Gabino Creek and construction of a box culvert in the same general location, which would improve habitat quality for the arroyo toad.

For the “Not Consistent” findings, Alternative B-10M conflicts with recommendations in the Chiquita, Gobernadora, Trampas, Cristianitos, and Blind Canyon sub-basins, including: **(1)** impacts to slope wetlands north of the treatment plant in Chiquita; **(2)** impacts in the Gobernadora sub-basin where development is proposed in the alluvial side canyons and the valley floor in a few locations, even though proposed development would generally avoid the valley floor and would be set back on Chiquadora Ridge; **(3)** impacts to one area of vernal pools in the Trampas Canyon sub-basin that support the Riverside and San Diego fairy shrimp; **(4)** impacts in the Cristianitos sub-basin that would preclude full implementation of the restoration recommendations; **(5)** impacts to the Verdugo sub-basin; and **(6)** impacts in Planning Area 8 (Northrop Grumman) concentrated in the Blind Canyon sub-basin on both ridges and the valley bottom in order to avoid the vast majority of the San Mateo Watershed in the planning area.

Overall, Alternative B-10M achieves a high (80 percent) degree of consistency with the Draft Watershed Planning Principles and has limited conflicts (12 percent) and limited significant impacts.

d. Alternative B-12

1. Southern Planning Guidelines Consistency Analysis

Under the overstated impact scenario,² Alternative B-12 is 83 percent (123/148 total) “Consistent” with the Draft Southern Planning Guidelines (*Table 8-3*). Modifications to the B-12 would be necessary in 17 (11 percent) instances for where it is “Could be Consistent.” Modifications to B-12 would be necessary to achieve consistency with Guidelines 42, 74, 82, 83, 91, 93, 96, 97, 98, 123, 124, 125, 126, 128, 134, 148 and 151. Alternative B-12 is “Not Consistent” with eight (4 percent) of the Guidelines.

² Impact estimates for Planning Areas (PA) 4 and 6-8 are based on the outer boundary envelopes for residential and commercial development in PAs 4 and 8 and potential orchards in PAs 6 and 7. Precise impacts cannot be calculated for these PAs until additional studies are completed to refine the actual impact areas. Ultimately impacts in these areas will be reduced by about 1,632 acres. See *Chapter 13, Section 13.2.4.a* for more details.

Regarding the consistent determinations, several determinations rely on the implementation of avoidance and/or minimization measures that were incorporated in either the GPA/ZC EIR, the draft SAMP EIS or proposed in this NCCP/MSAA/HCP as identified in *Table 8-1*.

With regard to the “Could be Consistent” findings, the types of modifications that would be necessary for B-12 to be consistent with Guidelines 42, 74, 82, 83, 91, 93, 96, 97, 98, 123, 124, 125, 126, 128, 134, 148 and 151 are: **(1)** the determination of the final location of proposed orchards in the Cristianitos sub-basin; **(2)** the determination of the final location of the 500 acres of development within Planning Area 8; and **(3)** implementation of stormwater and water quality management measures. Regarding the siting of proposed orchards in Planning Area 6, RMV has agreed to the following measure that would avoid and minimize impacts to many-stemmed dudleya, western spadefoot toad and southwestern pond turtle:

NCCP Minimization Measure 8-2. The permittee shall locate any potential orchards to be located in Planning Area 6, within the areas identified in *Figure 133-M*.

The determination of a final footprint for Planning Area 8 will be accomplished after five years of arroyo toad telemetry studies as noted in *Table 8-1*. Until such studies are complete, the feasibility of any potential modifications to address all “Could be Consistent” determinations related to this planning area is unknown. Modification “3” is feasible based on implementation of the WQMP.

For the “Not Consistent” findings, Alternative B-12 generally conflicts with the Draft Southern Planning Guidelines in three ways: **(1)** impacts to slope wetlands (Guideline 7), **(2)** impacts to brodiaea (Guideline 8); **(3)** impacts to Salt Spring checkerbloom (Guideline 15); **(4)** impacts to native grassland (Guideline 30 and 79); **(5)** limited impacts to specific species and habitat types (Guideline 39 and 54); and **(6)** impacts to linkage K (Guideline 68). Through implementation of the Habitat Restoration Plan, the functions of the slope wetlands will be replaced. Avoidance of the *major population* of brodiaea on Chiquadora Ridge is required per the SAMP USACE Special Permit Condition I.A.3: The permittee shall avoid all impacts to the thread-leaved brodiaea (a threatened facultative wetland plant) in a major population in a key location (as described in the Draft Southern Planning Guidelines) on Chiquadora Ridge as part of construction for Planning Area 2. As a result, the B-12 will result in 96 percent conservation of this *major population/key location* in addition to 19 other locations and 99 percent of other individuals. Impacts to Salt Spring checkerbloom would be addressed through the Translocation, Propagation and Management Plan for Special-status Plants (*Appendix I*). The B-12 Alternative would protect 74 percent of native grasslands in the overstated impact scenario. Conservation of native grasslands would increase based on the limited development anticipated in the Cristianitos sub-basin (25 acres of relocated Ranch headquarters and 50 acres of potential orchards). Impacts to specific species and habitats will be addressed through preservation of species and habitats

within the Habitat Reserve and management of these resources according to the HRMP. Impacts to linkage K are common to all Alternatives. None of the “Not Consistent” findings are a significant reserve design issue.

Overall Alternative B-12 achieves a high degree of consistency with the sub-basin protection, management and restoration recommendations, based on the worst case impact scenario. A higher degree of consistency is anticipated upon determination of the 500-acre development footprint for Planning Area 8.

2. Watershed Planning Principles Consistency Analysis

Alternative B-12 is 90 percent (36/40 total) “Consistent” with the Draft Watershed Planning Principles. Modifications to the B-12 Alternative would be necessary to achieve consistency with Principles 35 and 40 for which it is “Could be Consistent.” Alternative B-12 is “Not Consistent” with two (5 percent) of the Principles (10 and 33).

With regard to “Could be Consistent” findings, Principle 35 relates to the protection of oak woodlands in Blind Canyon. The final configuration of development within Planning Area 8 is undetermined at this time therefore no final consistency finding can be made, although the final development configuration could avoid the oak woodlands. Principle 40 recommends that development in the Talega sub-basin focus on the ridge tops and avoid the steeper side slopes. Similar to Principle 35, a “Could be Consistent” determination is made for Principle 40 pending the final configuration of Planning Area 8.

For the “Not Consistent” findings, Alternative B-12 primarily conflicts with recommendations in the Gobernadora sub-basin for protecting side canyons and the upper Gabino sub-basin for reducing the generation of fine sediments. According to the design of this Alternative:

Gobernadora Sub-basin. B-12 would not be consistent because although it proposes development generally set back from the valley floor and located primarily on class C and D soils, a portion of the “development bubble” would allow development to the edge of the valley floor.

Gabino Sub-basin. B-12 proposes no development in the Gabino sub-basin that could serve to reduce the generation of fine sediments and associated turbidity.

Overall, Alternative B-12 achieves a high degree (36 of 40) of consistency with the Draft Watershed Planning Principles and has limited significant conflicts (2 total) in two sub-basins as noted in the discussion above. The two conflict areas result from (1) concentrating Gobernadora development in a few side canyons in order to avoid the major canyon valley floors and

associated stream courses and (2) an absence of development in upper Gabino that could serve to reduces fine sediments and associated downstream turbidity.

8.3.3 Summary of Planning Species Conservation

The previous section summarized the consistency analyses for the ‘B’ Alternatives from the perspective of specific Southern Planning Guidelines and Watershed Planning Principles in relation to the sub-basins. *Table 8-3* provides a summary of the overall conservation of the planning species for the ‘B’ Alternatives, including the number of species locations, amount of suitable habitat (where relevant) and *major* and *important populations* and *key locations* for species for which they have been identified. *Table 8-3* is structured to allow a side-by-side analysis of the planning species for the Alternatives.

8.3.4 Circulation Systems Consistency Analysis

Each of the ‘B’ Alternatives analyzed in *Section 8.3* require an overall circulation system to support potential development areas shown as on *Figures 153-M* through *155-M*. In order to portray the potential impacts of the alternative circulation systems on the proposed permanent open space for each of the Alternatives, this section will analyze the circulation systems with regard to the sub-basin Draft Southern Planning Guidelines and Draft Watershed Planning Principles. Note that due to the complexity of planning infrastructure facilities for multiple alternatives, infrastructure facilities not related to circulation (*e.g.*, water, sewer, etc.) are not examined here; instead these facilities are examined in *Chapters 13* and *14* for the Alternative carried forward for further review. “Connectivity” considerations are based on the Draft Southern Planning Guidelines (General Policy 3.3 described in *Chapter 4*) and the accompanying Habitat Linkages and Wildlife Corridors Map (*Figure 41-M*) and are incorporated explicitly into the Draft Southern Planning Guidelines sub-basin Protection Recommendations. These connectivity considerations along with the Species Accounts (*Appendix E*) and other sub-basin recommendations provide criteria for reviewing potential impacts of the alternative circulation systems.

Those portions of the circulation systems located *outside* the development areas are reviewed for consistency with the specific Planning Guidelines and Watershed Principles applicable to each sub-basin. For the portions of the circulation systems located within development areas, the potential impacts already are reflected in the overall delineation of the particular development area and do not require separate analysis with respect to the proposed permanent open space for each Alternative.

Because the NCCP/MSAA/HCP will not provide the basis for authorizing Incidental Take of listed species for the SOCTIIP (FTC-S) and because the alternative circulation systems have

been designed to serve the alternative development areas without the need for the SOCTIIP, the analysis for Alternatives B-8 and B-12 is limited to the circulation element features which are proposed to be authorized for Incidental Take in conjunction with each alternative; potential impacts of the alternative SOCTIIP alignments on the Alternatives will be reviewed in the NCCP/MSAA/HCP EIR/EIS under the cumulative impacts section of that document. For Alternative B-10M the analysis assumes that the SOCTIIP project will be constructed as depicted on the Master Plan of Arterial Highways (MPAH) and, as a result, this alternative has assumed construction of the SOCTIIP as part of the circulation system. Therefore, for this alternative the MPAH SOCTIIP alignment is reviewed for consistency, along with other circulation facilities as described below.

The review of the different circulation systems reflects two different assumptions: (1) MPAH modification proposals proposed or identified in conjunction with the different Alternatives; and (2) the circulation elements shown on the existing MPAH (with the exception of the SOCTIIP for the reasons previously noted, except for Alternatives B-10M). These sets of circulation system assumptions will be employed for each sub-basin consistency review in this *Section 8.3.4*.

a. San Juan Creek Watershed Circulation System Consistency Review

1. Chiquita Sub-Basin

B-8 Alternative. The level of development proposed under the B-8 Alternative would not necessitate the construction of the Crown Valley Parkway extension shown on the MPAH. Consistency review of this facility is therefore not required.

Because no development is proposed in the Chiquita Sub-basin, Chiquita Canyon Road would not be constructed and therefore habitat linkage E would be unaffected.

The arterial extension of Cristianitos Road/"F" Street crossing over from the Gobernadora development area to Oso Parkway would be required. Because of the increased habitat connectivity within the Chiquita sub-basin under Alternative B-8, no significant connectivity impacts are anticipated.

The B-8 Alternative proposes one major change to the existing MPAH within the Chiquita sub-basin: the addition of major east-west arterial (Cow Camp Road) north of San Juan Creek. This modification would require the construction of a bridge over Chiquita Creek. This MPAH change would have the following consistency implications:

- The construction of Cow Camp Road north of San Juan Creek would require a bridge crossing over Chiquita Creek, but generally would avoid the valley floor and biological resources.
- Construction of a major arterial on the north side of San Juan Creek is anticipated to reduce traffic on existing Ortega Highway as set forth in GPA/ZC EIR 589. The reduction of traffic on Ortega Highway would reduce vehicle impacts on animal species and potentially further recovery efforts for the arroyo toad.

B-10M Alternative. Under the B-10M Alternative, the SOCTIIP MPAH alignment is assumed to be constructed within the Chiquita sub-basin. This SOCTIIP alignment is the same as that proposed for Cristianitos Road/"F" Street under the B-8 and B-12 Alternatives and the same consistency issues would occur; namely impacts to linkages D and E. Avian wildlife movement would not be impacted. In the event the SOCTIIP is not constructed, Cristianitos Road/"F" Street would be extended from the proposed Gobernadora development area to Oso Parkway as proposed for the other Alternatives.

Similar to the other 'B' Alternatives, Alternative B-10M also proposes the construction of Cow Camp Road. Therefore, the consistency analysis described above for Alternative B-8 would also apply to Alternative B-10M.

Chiquita Canyon Road to the east of the SMWD treatment plant would impact ground-dwelling wildlife movement in linkage E.

Widening of Ortega Highway between Avenida La Pata and the western boundary of the RMV Planning Area would result in temporary construction related impacts to San Juan Creek (linkage J) and permanent impacts associated with the placement of additional bridge piers. However, such impacts are not anticipated to impede wildlife movement along linkage J. Similar impacts would occur from the widening of the Antonio Parkway/Avenida La Pata bridge over San Juan Creek; these impacts are also not anticipated to impede wildlife movement.

B-12 Alternative. The B-12 Alternative proposes one major change to the existing MPAH within the Chiquita sub-basin: the addition of major east-west arterial (Cow Camp Road) north of San Juan Creek. Therefore, the consistency analysis described above for Alternative B-8 and Alternative B-10M would also apply to Alternative B-12.

The level of development proposed under the B-12 Alternative, particularly the limited development in the Chiquita sub-basin, would not necessitate the construction of the Crown Valley Parkway extension shown on the MPAH. Consistency review of this facility is therefore not required for this alternative.

The arterial extension (Cristianitos Road/"F" Street) from the Gobernadora development area to Oso Parkway would have limited impacts on linkage D due to the lack of development in middle Chiquita Canyon. Avian wildlife movement would not be impacted.

Widening of Ortega Highway between Avenida La Pata and the western boundary of the RMV Planning Area would result in temporary construction related impacts to San Juan Creek (linkage J) and permanent impacts associated with the placement of additional bridge piers. However, such impacts are not anticipated to impede wildlife movement along linkage J. Similar impacts would occur from the widening of the Antonio Parkway/Avenida La Pata bridge over San Juan Creek; these impacts are also not anticipated to impede wildlife movement.

2. Gobernadora Sub-basin

B-8 Alternative. Cristianitos Road/"F" Street would extend from the proposed Gobernadora development area to Oso Parkway. This road is proposed to be elevated above the valley floor and, if the creek is bridged and is constructed in such a way as to allow for the recommended creek meander restoration program, the arterial road would be consistent with the sub-basin recommendations. The road has been aligned to avoid impacting Sulphur Canyon and thus would be consistent with the Sulphur Canyon restoration recommendations. The B-8 Alternative Circulation System would be consistent with the sub-basin recommendations.

B-10M Alternative. The B-10M Alternative assumes that the SOCTIIP project would be constructed in the MPAH alignment. In order to be consistent with the sub-basin recommendations, the SOCTIIP would have to be elevated above the valley floor, bridge Gobernadora Creek, and be constructed to allow for implementation of the Gobernadora Creek Restoration Plan recommendations. The MPAH alignment would avoid impacting Sulphur Canyon and would be consistent with the Sulphur Canyon restoration recommendations that are also an element of the Aquatic Resources Habitat Restoration Plan. In the event the SOCTIIP is not constructed, Cristianitos Road/"F" Street would be extended from the Gobernadora development area to Oso Parkway as proposed for the other Alternatives.

B-12 Alternative. The B-12 Alternative shows Cristianitos Road/"F" Street extending from the proposed Gobernadora development area to Oso Parkway. This road is proposed to be elevated above the valley floor and, if the creek is bridged and the road is constructed in such a way as to allow for the recommended creek meander restoration program, the arterial road would be consistent with the sub-basin recommendations. The road has been aligned to avoid impacting Sulphur Canyon and thus would be consistent with the Sulphur Canyon restoration recommendation. The B-12 Circulation System would be consistent with the sub-basin recommendations.

3. Trampas and Central San Juan Sub-basin

All of the 'B' Alternatives propose the same arterial crossing of San Juan Creek and would have the same physical impacts, including permanent impacts resulting from placement of piers in the creek and temporary impacts associated with construction of Cristianitos Road/"F" Street. In addition to the arterial crossing, the B-10M Alternative also assumes construction of the SOCTIIP in the MPAH alignment. This would require a second crossing of San Juan Creek. Impacts from SOCTIIP generally would be similar to those of the arterial crossing (*i.e.*, temporary construction impacts and permanent impacts associated with the placement of piers).

Measures to reduce impacts to arroyo toad breeding habitat would be implemented during construction of the bridge, such as toad exclusion fencing, minimal to no construction activity during the breeding season, sediment control measures, and biological monitoring. Existing hydrology would be maintained with construction of the bridge.

4. Verdugo Sub-basin

B-8 Alternative. Because no development is proposed in Verdugo Canyon, the B-8 Alternative would be consistent with the recommendations.

B-10M Alternative. Verdugo Road would provide access to proposed development within the Verdugo sub-basin. This two-lane collector within Planning Area 4 would connect to Cow Camp Road near Caspers Wilderness Park. No consistency issues would occur with this road because it would avoid Verdugo Canyon and its source of coarse sediments. Outside of Planning Area 4, a combination of existing Verdugo Road and existing ranch roads would provide access to the ten proposed estate lots in upper Gabino Canyon. A waiver from County subdivision access requirements would be necessary for this type of access. Consistency with the sub-basin recommendations is dependent upon receipt of this waiver.

B-12 Alternative. The B-12 Alternative proposes that development in the Verdugo sub-basin, (but outside of Verdugo Canyon) be accessed via Cow Camp Road and Ortega Highway near Caspers Wilderness Park. No consistency issues would occur with this road as it would avoid the canyon and its source of coarse sediments.

b. San Mateo Creek Watershed Circulation System Consistency Analysis***1. Cristianitos Sub-basin***

B-8 Alternative. Under the B-8 Alternative, existing Cristianitos Road, a two-lane private ranch access road, would remain in its existing condition. Therefore, the B-8 Alternative circulation system would be consistent with the sub-basin recommendations.

B-10M Alternative. The B-10M Alternative circulation system in the Cristianitos sub-basin proposes using a combination of existing, but upgraded Cristianitos Road and other ranch roads, in addition to the SOCTIIP, to access the proposed development in Cristianitos Canyon and Cristianitos Meadows. Upgrading the ranch roads would: **(1)** avoid the headwaters of Cristianitos Creek; **(2)** preserve the opportunity to implement the coastal sage scrub/valley needlegrass grassland restoration recommendations; **(3)** avoid the alkali wetlands/creek riparian areas; and **(4)** preserve stream stabilization opportunities. Therefore, these upgraded roads would be consistent with the sub-basin recommendations.

The MPAH alignment for the SOCTIIP in the Cristianitos sub-basin would conflict with the restoration recommendations for the sub-basin, and may impact the alkali wetlands and the headwaters of Cristianitos Creek. The MPAH alignment for the SOCTIIP also would impact habitat linkage N that has been identified as an important dispersal linkage for the California gnatcatcher. The SOCTIIP would not be consistent with the sub-basin recommendations.

B-12 Alternative. Under the B-12 Alternative, existing Cristianitos Road, a two-lane private ranch access road, would remain in its existing condition. Therefore, the B-12 Alternative circulation system would be consistent with the sub-basin recommendations.

2. Gabino and Blind Canyons Sub-basin

B-8 Alternatives. Because the B-8 Alternative does not propose development in the San Mateo Creek Watershed, this Alternative would not create any potential circulation system impact considerations. This Alternative would be consistent with the sub-basin recommendations.

B-10M Alternative. The B-10M Alternative proposes to upgrade the existing Cristianitos Road to County standards and assumes construction of the SOCTIIP in the MPAH alignment. Regarding the upgrade of Cristianitos Road, the consistency analysis described above for the Cristianitos sub-basin would apply.

The SOCTIIP would likely result in temporary construction impacts and permanent impacts to Gabino Creek associated with placement of bridge piers in Gabino Creek.

B-12 Alternative. Under the B-12 Alternative, existing Cristianitos Road, a two-lane private ranch access road, would remain in its existing condition. Therefore, the B-12 Alternative circulation system would be consistent with the sub-basin recommendations.

3. La Paz Sub-basin

B-8, B-10M, and B-12 Alternatives. Alternatives B-8, B-10M, and B-12 do not assume development within the La Paz sub-basin and therefore would be consistent with the sub-basin recommendations.

4. Talega Sub-Basin

B-8 Alternative. Because the B-8 Alternative does not propose development in the San Mateo Creek Watershed, this Alternative would not create any potential circulation system impact considerations. This Alternative would be consistent with the sub-basin recommendations.

B-10M Alternative. The B-10M Alternative circulation system proposes construction of a bridge over Cristianitos Creek connecting Avenida Pico to existing Cristianitos Road. Internal residential streets only would be constructed in the Talega sub-basin. Construction of a bridge over Cristianitos Creek would not affect dry season and stormwater flows and thus would not cause any potential conflicts with the recommendations for this sub-basin.

B-12 Alternative. Access to proposed development in the Talega sub-basin under the B-12 Alternative would be via construction of a bridge over Cristianitos Creek connecting existing Avenida Pico to existing Cristianitos Road. Internal residential streets only would be constructed in the Talega sub-basin.

5. Other Planning Area

B-8 Alternative. Because the B-8 Alternative does not propose development in the “Other Planning Area,” this Alternative would not create any potential circulation system impact. This Alternative would be consistent with the recommendations.

B-10M Alternative. Within the Other Planning Area, the B-10M Alternative proposes the same Cristianitos Road Bridge and upgrades as discussed above for the Talega sub-basin. However, in addition to the Cristianitos Road Bridge, the B-10M Alternative also assumes that the SOCTIIP would be constructed in the MPAH alignment. The Far East alignment would impact habitat linkage N, potentially affecting gnatcatcher connectivity from northerly sub-basins, particularly the Cristianitos sub-basin, to populations in lower Cristianitos Creek/San Mateo Creek on MCB Camp Pendleton. Breeding and foraging habitat and movement opportunities within the Cristianitos stream course and adjacent alluvial terraces for the arroyo toad may be affected by

the Far East alignment. The east-west habitat linkage O from Gabino Creek to the confluence with Cristianitos Creek to protect wildlife movement from Gabino Canyon and the Donna O'Neill Conservancy may be impacted by construction of the SOCTIIP in the Far East alignment. The SOCTIIP in the Far East alignment would not be consistent with the sub-basin Planning Recommendations.

B-12 Alternative. The B-12 Alternative circulation system proposes construction of a bridge over Cristianitos Creek connecting existing Avenida Pico to existing Cristianitos Road within the Other Planning Area. Temporary impacts to Cristianitos Creek resulting from construction of this bridge would occur, as would permanent impacts associated with the placement of piers in Cristianitos Creek to support the bridge structure. North-south wildlife movement along Cristianitos Creek over the long-term would be unaffected by the bridge. The B-12 Alternative circulation system could be consistent with the sub-basin recommendations.

TABLE 8-1
DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
SAN JUAN CREEK WATERSHED				
<i>Chiquita Canyon Sub-basin Protection Recommendations</i>				
1. Protect the major north-south connection to Central San Juan Creek by providing a habitat linkage between Chiquita Creek and the eastern edge of the Ladera Open Space and by restricting new impervious surfaces west of Chiquita Creek in order to maintain habitat integrity between the creek and Chiquita Ridge.	Not Consistent. A-5 would not be consistent because it would include development west of Chiquita Creek, disrupting the contiguous habitat linkage between the creek and Ladera Open Space. Impervious surfaces are proposed west of the creek. Habitat integrity would not be maintained under this alternative.	Consistent. B-8 would be consistent because it proposes no development within Chiquita Canyon and therefore would protect the major north-south connection to San Juan Creek.	Consistent. B-10M would be consistent because it would provide a habitat linkage in the Chiquita sub-basin to San Juan Creek by protecting Chiquita Ridge.	Consistent. B-12 would be consistent because it would provide a habitat linkage in the Chiquita sub-basin to San Juan Creek by protecting Chiquita Ridge and proposing no development west of Chiquita Creek.
2. Maintain east-west biological connectivity by protecting habitat linkages and wildlife corridors between Arroyo Trabuco, Chiquita Canyon, and Gobernadora Canyon. Biological connectivity should be maintained between Chiquita, Gobernadora and Arroyo Trabuco by protecting habitat linkages at a minimum of three locations within the sub-basin: 1) via rim-to-rim preservation of Sulphur Canyon (approximately 2,000 to 2,500 feet wide); 2) at the Narrows where the canyon is only 700-800 feet wide (approximately 3,000 feet south of Tesoro High School) and connects to Sulphur Canyon; and 3) in contiguous patches of coastal sage scrub through the major canyon north and east of the wastewater treatment plant.	Not Consistent. A-5 would not be consistent because although it would protect Sulphur Canyon rim to rim consistent with the recommendation, it proposes development at the Narrows, and in the major canyon north of the treatment plant, thus overall east-west biological connectivity would not be protected.	Consistent. B-8 would be consistent because it proposes no development within Chiquita Canyon, and thus would allow movement throughout of the canyon and specifically movement at the Narrows, north of the treatment plan, and through Sulphur Canyon, which would be protected rim-to-rim. Coastal sage scrub patches north and east of the treatment plant would be protected. Wildlife movement across the proposed arterial that would connect the Gobernadora development area to Oso Parkway (see Circulation Consistency Review in Section 8.3.4) would be facilitated by implementation of GPA/ZC EIR mitigation measure 4.9-22 which sets forth standards for bridge height, fencing and lighting. In addition wildlife movement would be facilitated by NCCP Minimization Measure 8-1 as follows: RMV shall include a	Consistent. B-10M would be consistent because it would maintain east-west connectivity by protecting the narrows, protecting coastal sage scrub patches in the major canyon north and east of the treatment plant and protecting Sulphur Canyon rim-to-rim within an expansion of Riley Wilderness Park. Wildlife movement across the proposed arterial proposed to connect the Gobernadora development area to Oso Parkway (see Circulation Consistency Review in Section 8.3.4) would be facilitated by implementation of GPA/ZC EIR mitigation measure 4.9-22 which sets forth standards for bridge height, fencing and lighting. In addition wildlife movement would be facilitated by NCCP Minimization Measure 8-1	Consistent. B-12 would be consistent because it proposes limited development within Chiquita Canyon north of the wastewater treatment plant, allowing unrestricted movement throughout this portion of the canyon and specifically unrestricted movement at the Narrows, north of the treatment plan, and through Sulphur Canyon, which would be protected rim-to-rim. Some coastal sage scrub patches immediately north and east of the treatment plant would be impacted by development, but coastal sage scrub in middle Chiquita Canyon would largely be protected. Wildlife movement across the proposed arterial that would connect the Gobernadora development area to Oso Parkway (see Circulation Consistency Review in Section 8.3.4) would be facilitated by implementation of GPA/ZC EIR mitigation measure 4.9-22 which sets forth standards for bridge height, fencing and

TABLE 8-1
DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
		wildlife culvert at Chiquita Narrows within the design of Cristianitos Road with the following dimensions: The culvert shall have a minimum dimension of 15 by 15 feet, the bottom of the culvert shall be of a natural substrate, light shall be visible from one end of the culvert to the other, vegetation installed at either end shall be native low growing to prevent predator-prey stalking, and if required for public health and safety, all lighting on the road above the culvert shall be shielded to prevent spill-over effects.		lighting. In addition wildlife movement would be facilitated by NCCP Minimization Measure 8-1.
3. Protect breeding and foraging habitat for the least Bell's vireo within Chiquita Canyon by focusing on protection of riparian habitat in Chiquita Creek.	Not Consistent. A-5 would not be consistent because while it would avoid direct impacts to riparian habitat in Chiquita Creek, substantial development is proposed on both sides of the creek that absent minimization measures result in potential indirect impacts to both breeding and foraging habitat.	Consistent. B-8 would be consistent because it proposes no development within Chiquita Canyon, and therefore breeding and foraging habitat for the vireo would be protected.	Consistent. B-10M would be consistent because it would avoid impacts to the riparian habitat in Chiquita Creek and uplands west of the creek south of the wastewater treatment plant. B-10M also would restrict development west of the creek and north of the treatment plant to pervious surfaces and proposed golf course that would be consistent with maintaining upland foraging habitat for the vireo.	Consistent. B-12 would be consistent because it would avoid impacts to the riparian habitat in Chiquita Creek and uplands west of the creek south of the wastewater treatment plant.
4. Protect breeding habitat and, to the extent feasible, protect foraging habitat for raptors and other species along Chiquita Creek.	Not Consistent. A-5 would not be consistent because while it would avoid raptor breeding habitat in Chiquita Creek, adjacent foraging habitat would not be protected.	Consistent. B-8 would be consistent because it proposes no development within Chiquita Canyon and therefore raptor breeding and foraging habitat would be protected.	Could be Consistent. B-10M could be consistent because it would avoid raptor breeding habitat in Chiquita Creek. Adjacent foraging habitat may be maintained by the proposed golf course use north of the treatment plant and a development pattern which would avoid the major	Consistent. B-12 would be consistent it would avoid raptor breeding habitat in Chiquita Creek. Raptor foraging habitat west of Chiquita Creek and east of Chiquita Creek in middle Chiquita Canyon would be protected.

TABLE 8-1
DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
			side canyons north of the treatment plant.	
5. Protect riparian habitat in Chiquita Canyon by recognizing the influences of terrains and hydrology on the Chiquita Creek riparian system (see Watershed and Sub-basin Planning Principles).	Not Consistent. A-5 would not be consistent because it does not consider the influence of terrains and hydrology of the Chiquita Creek riparian system, as development is proposed within the side canyons and adjacent to the creek.	Consistent. B-8 would be consistent because it proposes no development in Chiquita Canyon and riparian habitat and existing terrains and hydrology would be maintained.	Consistent. B-10M would be consistent because the development pattern proposed under B-10M considers the influence of terrains and hydrology on Chiquita Creek. The major side canyons would either be avoided along the entire western side of the creek and along both sides of the creek north of the treatment plant or a pervious land use (golf course) would be constructed.	Consistent. B-12 would be consistent because the proposed development pattern considers the influence of terrains and hydrology on Chiquita Creek. The major side canyons would be avoided along the entire western side of the creek and along the east side of the creek in middle Chiquita Canyon.
6. Protect the two vernal pools and their contributing hydrologic sources along Radio Tower Road that support the Riverside fairy shrimp, San Diego fairy shrimp and western spadefoot toad. The vernal pools located on Chiquita Ridge are within the existing protected Ladera Open Space.	Consistent. A-5 would be consistent because it would avoid the two Radio Tower Road vernal pools in the Chiquita sub-basin.	Consistent. B-8 would be consistent because it would avoid the two Radio Tower Road vernal pools in the Chiquita sub-basin.	Consistent. B-10M would be consistent because it would avoid the two Radio Tower Road vernal pools in the Chiquita sub-basin.	Consistent. B-12 would be consistent because it would avoid the two Radio Tower Road vernal pools in the Chiquita sub-basin.
7. Protect slope wetlands and maintain their primary sub-surface water supply recharge characteristics and, where avoidance is infeasible, minimize and mitigate impacts.	Consistent. A-5 would be consistent because as a wetlands avoidance alternative, it would avoid direct impacts on slope wetlands. Deep subsurface recharge areas would not be affected by development under this Alternative (see Figure 152-M).	Consistent. B-8 would be consistent because it proposes no development in Chiquita Canyon and the slope wetlands and their contributing hydrologic sources would be protected.	Not Consistent. B-10M would not be consistent because it would impact two slope wetlands north of the treatment plant and east of the creek. It would not impact slope wetlands below the treatment plant or west of the creek. Given existing hardpan soils, future landscape irrigation and the protection of a significant portion of Chiquadora Ridge, recharge would be maintained into the deep groundwater system supporting the slope wetlands (see Figure 152-M).	Not Consistent. B-12 would not be consistent because it would impact four slope wetlands in Chiquita Canyon; two in lower Chiquita Canyon in Planning Area 2, one in the development area south of Tesoro High School, and one in the proposed arterial to connect the Planning Area 3 (Gobernadora) to Oso Parkway.
8. In conjunction with the large population of 2,000 thread-leaved brodiaea flowering stalks on	Consistent. A-5 would be consistent because it would avoid all brodiaea populations in the sub-	Consistent. B-8 would be consistent because it proposes no development in Chiquita	Consistent. B-10M would be consistent as it would protect the large population of 2,000 brodiaea,	Not Consistent. B-12 would not be consistent because while it would protect the large population

TABLE 8-1
DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
Chiquadora Ridge in the Gobernadora sub-basin, protect two of the four small locations of thread-leaved brodiaea in Chiquita Canyon. Combined with the large population on Chiquadora Ridge, protection of these key locations would contribute to protection of a major population.	basin thereby contributing to the protection of a major population.	Canyon and all brodiaea locations would be protected.	and through implementation of GPA/ZC EIR mitigation measure 4.9-1 would avoid two of the four small populations.	of 2,000 brodiaea through implementation of avoidance measure proposed in the SAMP EIS as Special Condition I.A.3, the four small populations would be impacted.
9. Protect the Chiquita Ridge important population and key location of many-stemmed dudleya totaling about 2,430 individuals in approximately 35 discrete locations. This population includes seven locations totaling 100 to 420 individuals each.	Consistent. A-5 would be consistent because it would avoid the important population and key location of many-stemmed dudleya on Chiquita Ridge.	Consistent. B-8 would be consistent because it proposes no development on Chiquita Ridge and therefore would avoid the important population and key location of many-stemmed dudleya on Chiquita Ridge.	Consistent. B-10M would be consistent because it would avoid the important population and key location of many-stemmed dudleya on Chiquita Ridge.	Consistent. B-12 would be consistent because it proposes no development on Chiquita Ridge and therefore would avoid the important population and key location of many-stemmed dudleya on Chiquita Ridge.
12. Minimize impacts to the key location of southern tarplant west of Chiquita Creek in Middle Chiquita Canyon to the maximum extent feasible. Minimize impacts to the remainder of the major population in Middle Chiquita Canyon. Mitigate impacts to southern tarplant in a manner similar to the successful Tesoro mitigation project (ongoing mitigation projects in Chiquita Canyon have demonstrated over three successive years that this plant can be readily propagated from seed).	Not Consistent. A-5 would not be consistent because it proposes development west of Chiquita Creek in a location that would result in impacts to the southern tarplant.	Consistent. B-8 would be consistent because it proposes no development within Chiquita Canyon.	Consistent. B-10M would be consistent because it proposes a golf course west of Chiquita Creek, the design of which would minimize impacts to the key location and major population of southern tarplant. In addition GPA/ZC EIR mitigation measure 4.9-2 requires substantial avoidance of the major population.	Consistent. B-12 would be consistent because it would not impact the key location and major population of southern tarplant in middle Chiquita Canyon
13. Protect the major population of southern tarplant in a key location in Lower Chiquita Canyon.	Consistent. A-5 would be consistent it would avoid impacts to this major population in a key location.	Consistent. B-8 would be consistent because it proposes no development within Chiquita Canyon.	Consistent. B-10M would be consistent because it would avoid impacts to this major population in a key location.	Consistent. B-12 would be consistent because it would avoid impacts to this major population in a key location.
14. Protect the key locations of Coulter's saltbush in Middle and Lower Chiquita Canyon. Minimize impacts to important populations within the sub-basin and mitigate unavoidable impacts in Chiquita Canyon.	Not Consistent. A-5 would not be consistent because it proposes development in Middle Chiquita Canyon that would affect the major and important populations in key locations.	Consistent. B-8 would be consistent because it proposes no development within Chiquita Canyon.	Consistent. B-10M would be consistent because it proposes a golf course west of Chiquita Creek, the design of which would minimize impacts to the key location and major population of Coulter's saltbush. In addition GPA/ZC EIR	Consistent. B-12 would be consistent because it would avoid the important population southwest of the treatment plant.

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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
			mitigation measure 4.9-3 requires substantial avoidance of the major population.	
15. Protect the two key locations of Salt Spring checkerbloom in the slope wetlands in lower Chiquita Canyon.	Consistent. A-5 would be consistent because it would avoid impacts to the slope wetlands in lower Chiquita and therefore would avoid impacts to the Salt Spring checkerbloom.	Consistent. B-8 would be consistent because it proposes no development within Chiquita Canyon.	Consistent. B-10M would be consistent because it would avoid impacts to the slope wetlands in lower Chiquita supporting Salt Spring checkerbloom and their subsurface recharge characteristics would not be affected. Given existing hardpan soils, future landscape irrigation and the protection of a significant portion of Chiquadora Ridge, recharge would be maintained into the deep groundwater system supporting the slope wetlands (see <i>Figure 152</i>).	Not Consistent. B-12 would not be consistent because it would directly impact the two slope wetlands supporting Salt Spring checkerbloom in lower Chiquita.
16. Protect the important population of the California gnatcatcher and coastal sage scrub in the portion of the sub-basin south of San Juan Creek to maintain resident and dispersal habitat for the gnatcatcher between Chiquita Ridge and San Juan Capistrano and San Clemente.	Not Consistent. A-5 would not be consistent because while it would avoid impacts to the gnatcatcher locations within this important population, proposed development in the general area would fragment habitat and potentially disrupt dispersal.	Consistent. B-8 would be consistent because it would avoid impacts to coastal sage scrub and the gnatcatcher important location south of San Juan Creek in the Chiquita sub-basin and therefore would maintain opportunities for resident and dispersal habitat between Chiquita Ridge and San Juan Capistrano and San Clemente.	Consistent. B-10M would be consistent because it would avoid impacts to coastal sage scrub and gnatcatchers located south of San Juan Creek in the Chiquita sub-basin and therefore would maintain opportunities for resident and dispersal habitat between Chiquita Ridge and San Juan Capistrano and San Clemente.	Consistent. B-12 would be consistent because it would avoid impacts to coastal sage scrub and the gnatcatcher important population south of San Juan Creek in the Chiquita sub-basin and therefore would maintain opportunities for resident and dispersal habitat between Chiquita Ridge and San Juan Capistrano and San Clemente.
Chiquita Canyon Sub-basin Management Recommendations				
17. Protect at least 80 percent of the existing coastal sage scrub and gnatcatcher locations within the major population within the Chiquita and Wagon Wheel sub-basins and the Chiquadora Ridge portion of the Gobernadora sub-basin.	Could be Consistent. A-5 could be consistent because all gnatcatcher locations and 95% of the coastal sage scrub in the major population in the Chiquita and Wagon Wheel sub-basins and Chiquadora ridge portion of the Gobernadora sub-basin would be protected, however fragmentation and loss of habitat value may occur with the proposed	Consistent. B-8 would be consistent because it proposes no development in the Chiquita and Wagon Wheel sub-basins and the Chiquadora Ridge portion of the Gobernadora sub-basin. 95% of gnatcatcher sites and 97% of existing coastal sage scrub within the major population located in the Chiquita and	Could be Consistent. B-10M could be consistent because it would protect 89% of existing coastal sage scrub and 87% of gnatcatcher locations within the major population located in the Chiquita and Wagon Wheel sub-basins and the Chiquadora Ridge portion of the Gobernadora sub-basin; however, fragmentation and loss of habitat	Consistent. B-12 would be consistent because it would protect 89% of existing coastal sage scrub and 85% of gnatcatcher locations within the major population located in the Chiquita and Wagon Wheel sub-basins and the Chiquadora Ridge portion of the Gobernadora sub-basin.

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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
	development pattern.	Wagon Wheel sub-basins and the Chiquadora Ridge portion of the Gobernadora sub-basin would be protected. The only impacts to coastal sage scrub and gnatcatchers would be in the Narrow Canyon portion of the Chiquita sub-basin as a result of development in PA 1 (not to be confused with the "Narrows" in lower Chiquita Canyon).	value may occur with the proposed development pattern.	
18. Implement a cowbird trapping program to mitigate for impacts to existing habitat within the sub-basin and for potential impacts associated with future development. The cowbird trapping program will be evaluated on an annual basis and trap locations and trapping effort will be adjusted as part of the overall Adaptive Management Program (e.g., if the number of trapped cowbirds drops to a prescribed threshold, the trapping program may be terminated or otherwise modified).	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program.	Not applicable. B-8 proposes no development in Chiquita Canyon and therefore implementation of this management recommendation within the sub-basin would not be necessary.	Consistent. B-10M would be consistent because it proposes implementation of an Adaptive Management Program which includes cowbird trapping as part of the Invasive Species Control Plan.	Consistent. B-12 would be consistent because it proposes implementation of an Adaptive Management Program which includes cowbird trapping as part of the Invasive Species Control Plan.
19. Implement a management program for protected sensitive plant locations in the sub-basin, including control of non-native invasive species, management of grazing and minimization of human access and disturbance as part of the Adaptive Management Program.	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program.	Could be Consistent. B-8 could be consistent if an additional funding source is identified to implement the Adaptive Management Program, including the Invasive Species Control Plan.	Consistent. B-10M would be consistent because it proposes implementation of an Adaptive Management Program which includes an Invasive Species Control Plan. B-10M would implement a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 11.	Consistent. B-12 would be consistent because it proposes implementation of an Adaptive Management Program which includes an Invasive Species Control Plan. B-12 would implement a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 11.

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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
20. Implement a coastal sage scrub (CSS)/Valley needlegrass grassland (VGL) restoration program to enhance habitat connectivity and mitigate for impacts to existing habitat associated with future development.	Not Consistent. A-5 would not be consistent because the proposed development pattern would preclude this restoration recommendation and because no Adaptive Management Program is proposed.	Could be Consistent. B-8 could be consistent because it proposes no development in the sub-basin and thus there would be opportunities for restoration. For B-8 to be consistent an additional funding source likely would needed to be identified to implement the Adaptive Management Program, including the Habitat Restoration Plan component.	Consistent. B-10M would be consistent through implementation of the Adaptive Management Program, which includes a Habitat Restoration Plan.	Consistent. B-12 would be consistent through implementation of the Adaptive Management Program, which includes a Habitat Restoration Plan.
21. Translocate salvaged thread-leaved brodiaea and many-stemmed dudleya to CSS/VGL restoration and enhancement areas where feasible and appropriate. Potential restoration and enhancement areas in the sub-basin include Chiquita Ridge and Chiquadora Ridge.	Could be Consistent. A-5 could be consistent as it proposes no impacts to thread-leaved brodiaea. Mitigation for impacts to many-stemmed dudleya could be required in accordance with CEQA for this alternative.	Could be Consistent. B-8 could be consistent because it proposes no development in the sub-basin and thus there would be opportunities for implementation of the Translocation, Propagation and Management Plan for Special-status Plant Species component of the Adaptive Management Program. For B-8 to be consistent an additional funding source likely would be needed to implement the Adaptive Management Program.	Consistent. B-10M would be consistent because it would implement the Translocation, Propagation and Management Plan for Special-status Plant Species component of the Adaptive Management Program.	Consistent. B-12 would be consistent because it would implement the Translocation, Propagation and Management Plan for Special-status Plant Species component of the Adaptive Management Program.
22. Salvage clay topsoils from development areas where feasible and appropriate and transport to restoration areas. Salvaged topsoils may be used to create additional suitable brodiaea and dudleya habitat and may contain seedbank.	Could be Consistent. A-5 could be consistent as it proposes no impacts to thread-leaved brodiaea. Mitigation for impacts to many-stemmed dudleya could be required in accordance with CEQA for this alternative.	Could be Consistent. B-8 could be consistent because it proposes no development in the sub-basin and thus there would be opportunities for implementation of the Translocation, Propagation and Management Plan for Special-status Plant Species component of the Adaptive Management Program. For B-8 to be consistent an additional funding source likely	Consistent. B-10M would be consistent because it would implement the Translocation, Propagation and Management Plan for Special-status Plant Species component of the Adaptive Management Program.	Consistent. B-12 would be consistent because it would implement the Translocation, Propagation and Management Plan for Special-status Plant Species component of the Adaptive Management Program.

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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
		would be needed to implement the Adaptive Management Program.		
25. Translocate salvaged southern tarplant and Coulter's saltbush to suitable restoration and enhancement areas in the sub-basin. Receiver areas should support alkali soils suitable for both species and should be placed in locations that maximize connectivity and genetic exchange.	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program and thus would not implement the Translocation, Propagation and Management Plan for Special-status Plant Species component of the Adaptive Management Program.	Could be Consistent. B-8 could be consistent because it proposes no development in the sub-basin and thus there would be opportunities for implementation of the Translocation, Propagation and Management Plan for Special-status Plant Species component of the Adaptive Management Program. For B-8 to be consistent an additional funding source likely would be needed to implement the Adaptive Management Program.	Consistent. B-10M would be consistent because it would implement of the Translocation, Propagation and Management Plan for Special-status Plant Species component of the Adaptive Management Program.	Consistent. B-12 would be consistent because it would implement of the Translocation, Propagation and Management Plan for Special-status Plant Species component of the Adaptive Management Program.
26. Implement restoration efforts to address localized headcuts within the sub-basin as further described in the Watershed and Sub-basin Planning Principles – Chiquita Sub-basin.	Not Consistent. A-5 would not be consistent because it would not implement the Habitat Restoration Plan component of the Adaptive Management Program.	Could be Consistent. B-8 could be consistent if sufficient funds are available to implement the Habitat Restoration Plan component of the Adaptive Management Program under this Alternative.	Consistent. B-10M would be consistent because it would implement the Habitat Restoration Plan component of the Adaptive Management Program.	Consistent. B-12 would be consistent because it would implement the Habitat Restoration Plan component of the Adaptive Management Program.
<i>Gobernadora Sub-basin Protection Recommendations</i>				
27. Maintain a continuous upland habitat linkage along the east-facing slopes of Chiquadora Ridge between San Juan Creek and Sulphur Canyon.	Consistent. A-5 would be consistent because it would provide for a continuous habitat linkage along the east-facing slope of Chiquadora Ridge.	Consistent. B-8 would be consistent because it would provide for a continuous habitat linkage along the east-facing slope of Chiquadora Ridge. However, for B-8 to be consistent, it would have to address wildlife movement along Chiquadora Ridge where the extension of Cristianitos Road connecting the Gobernadora development area to Oso Parkway would cross the	Consistent. B-10M would be consistent because it would provide for a continuous habitat linkage along the east-facing slope of Chiquadora Ridge. However, for B-10M to be consistent, it would have to address wildlife movement along Chiquadora Ridge where the extension of Cristianitos Road connecting the Gobernadora development area to Oso Parkway would cross the ridgeline. Avifauna would be able to cross the roadway,	Consistent. B-12 would be consistent because it would provide for a continuous habitat linkage along the east-facing slope of Chiquadora Ridge. However, for B-12 to be consistent, it would have to address wildlife movement along Chiquadora Ridge where the extension of Cristianitos Road connecting the Gobernadora development area to Oso Parkway would cross the ridgeline. Avifauna would be able to cross

TABLE 8-1
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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
		ridgeline. Avifauna would be able to cross the roadway, but accommodation of movement by ground-dwelling wildlife would be facilitated by implementation of GPA/ZC EIR mitigation measure 4.9-22 which sets forth standards for bridge height, fencing and lighting.	but accommodation of movement by ground-dwelling wildlife would be facilitated by implementation of GPA/ZC EIR mitigation measure 4.9-22 which sets forth standards for bridge height, fencing and lighting.	the roadway, but accommodation of movement by ground-dwelling wildlife would be facilitated by implementation of GPA/ZC EIR mitigation measure 4.9-22 which sets forth standards for bridge height, fencing and lighting.
28. Protect Sulphur Canyon rim-to-rim to maintain a functional biological connection from Gobernadora to Gen. Thomas F. Riley Regional Park in Wagon Wheel Canyon and upper Chiquita Canyon.	Consistent. A-5 would be consistent because it would protect Sulphur Canyon rim-to-rim.	Consistent. B-8 would be consistent because it would protect Sulphur Canyon rim-to-rim.	Consistent. B-10M would be consistent because it would protect Sulphur Canyon rim-to-rim.	Consistent. B-12 would be consistent because it would protect Sulphur Canyon rim-to-rim.
29. Protect a 2,000- to 2,500-foot area along the southern boundary of Coto de Caza to provide for functional east-west wildlife movement from Sulphur Canyon to Bell Canyon.	Consistent. A-5 would be consistent because it would protect a 2,000 to 2,500-foot area along the southern boundary of Coto de Caza to provide for functional east-west wildlife movement from Sulphur Canyon to Bell Canyon.	Consistent. B-8 would be consistent because it would protect a 2,500-foot area along the southern boundary of Coto de Caza to provide for functional east-west wildlife movement from Sulphur Canyon to Bell Canyon.	Consistent. B-10M would be consistent because it would protect a 2,100-foot area along the southern boundary of Coto de Caza to provide for functional east-west wildlife movement from Sulphur Canyon to Bell Canyon.	Consistent. B-12 would be consistent because it would protect a 2,500-foot area along the southern boundary of Coto de Caza to provide for functional east-west wildlife movement from Sulphur Canyon to Bell Canyon.
30. Minimize impacts to native grasslands. Any impacts resulting from future land uses will be addressed through an overall native grasslands restoration program.	Not Consistent. A-5 would not be consistent because the vast majority of grassland (native and non-native) in the sub-basin would be impacted and there is no Adaptive Management Program proposed.	Not Consistent. B-8 would not be consistent because the vast majority of grassland (native and non-native) in the sub-basin would be impacted. Also, under B-8 the ability to fund the Habitat Restoration Plan component of the Adaptive Management Program is uncertain.	Not Consistent. B-10M would not be consistent because the vast majority of grassland (native and non-native) in the sub-basin would be impacted. However, the Habitat Restoration Plan component of the Adaptive Management Program would provide for VGL restoration elsewhere in the planning area.	Not Consistent. B-12 would not be consistent because the vast majority of grassland (native and non-native) in the sub-basin would be impacted. However, the Habitat Restoration Plan component of the Adaptive Management Program would provide for VGL restoration elsewhere in the planning area.
31. Protect the southern willow scrub in GERA that provides nesting habitat for least Bell's vireo, southwestern willow flycatcher, yellow-breasted chat, Cooper's hawk, red-shouldered hawk, and barn owl.	Consistent. A-5 would be consistent as it would avoid impacts to GERA, as well as upstream habitat in Gobernadora..	Consistent. B-8 would be consistent because it would avoid impacts to GERA as well as upstream habitat in Gobernadora.	Consistent. B-10M would be consistent because it would avoid impacts to GERA as well as upstream habitat in Gobernadora.	Consistent. B-12 would be consistent because it would avoid impacts to GERA as well as upstream habitat in Gobernadora.

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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
32. Avoid and minimize impacts to oak woodlands in northern Gobernadora (on RMV) along the ridgelines between the Gobernadora and Bell Canyon sub-basins.	Consistent. A-5 would be consistent because it would include a setback from the Gobernadora/Bell ridgeline and also would provide for the protection of oak woodlands within the upper part of the sub-basin.	Consistent. B-8 would be consistent because it would include a setback from the Gobernadora/Bell ridgeline and also would protect oak woodlands in the northern portion of the sub-basin.	Consistent. B-10M would be consistent because it would include a setback from the Gobernadora/Bell ridgeline and also would provide for the protection of oak woodlands within the upper part of the sub-basin.	Consistent. B-12 would be consistent because it would include a setback from the Gobernadora/Bell ridgeline and also would provide for the protection of oak woodlands within the upper part of the sub-basin.
33. Keep open sufficient valley bottom south of Coto de Caza and above the knickpoint to allow creek meander for floodplain connection. Refer also to the Watershed and Sub-basin Planning Principles – Chiquita Gobernadora Sub-basin.	Consistent. A-5 would be consistent because development in the sub-basin would provide for sufficient open valley bottom south of Coto de Caza and above the knickpoint to allow creek meander for floodplain connection.	Consistent. B-8 would be consistent because development in the sub-basin would provide for sufficient open valley bottom south of Coto de Caza and above the knickpoint to allow creek meander for floodplain connection.	Consistent. B-10M would be consistent because development in the sub-basin would provide for sufficient open valley bottom south of Coto de Caza and above the knickpoint to allow creek meander for floodplain connection.	Consistent. B-12 would be consistent because development in the sub-basin would provide for sufficient open valley bottom south of Coto de Caza and above the knickpoint to allow creek meander for floodplain connection.
34. Protect sufficient grassland habitat in the valley bottom in the northern portion of lower Gobernadora on RMV property to support a nesting population of the tricolored blackbird. (The existing nesting ponds are located within Coto de Caza.)	Consistent. A-5 would be consistent because it would protect grassland habitat in the valley bottom in the northern portion of lower Gobernadora.	Consistent. B-8 would be consistent because it would protect grassland habitat in the valley bottom in the northern portion of lower Gobernadora. The SMWD Multi-purpose Basin would result in impacts to a portion of this grassland area, but these potential impacts to foraging grasslands could be offset by the expansion of wetland breeding habitat associated with the basin.	Consistent. B-10M would be consistent because it would protect grassland habitat in the valley bottom in the northern portion of lower Gobernadora. The SMWD Multi-purpose Basin would result in impacts to a portion of this grassland area, but these potential impacts to foraging grasslands could be offset by the expansion of wetland breeding habitat associated with the basin.	Consistent. B-12 would be consistent because it would protect grassland habitat in the valley bottom in the northern portion of lower Gobernadora. The SMWD Multi-purpose Basin would result in impacts to a portion of this grassland area, but these potential impacts to foraging grasslands could be offset by the expansion of wetland breeding habitat associated with the basin.
35. Protect the thread-leaved brodiaea major population in a key location supporting approximately 2,000 flowering stalks on Chiquadora Ridge.	Consistent. A-5 would be consistent because it would avoid this population.	Consistent. B-8 would be consistent because it would avoid this population.	Consistent. B-10M would be consistent because it would avoid this population.	Consistent. B-12 would be consistent because it would avoid this population through implementation of avoidance measures.
37. Protect the Chiquadora Ridge major population of many-stemmed dudleya totaling about 8,600 individuals in approximately 48 discrete locations. This population includes 24 locations	Consistent. A-5 would be consistent because it would protect about 42 of 48 locations (88%) totaling approximately 8,468 of 8,600 individuals (98%) in this	Consistent. B-8 would be consistent because all locations of dudleya in this major population would be protected.	Consistent. B-10M would be consistent because it would protect about 44 of 48 locations (92%) totaling approximately 8,659 individuals (99%) in this major	Consistent. B-12 would be consistent because it would protect about 40 of 48 locations (83%) totaling approximately 8,020 individuals (93%) in this major

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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
totaling 100 to 750 individuals each, with nine of these locations numbering more than 500 individuals.	major population of dudleya.		population of dudleya.	population of dudleya.
38. Protect the major population of southern tarplant totaling 10,000+ individuals located in GERA.	Consistent. A-5 would be consistent because it would avoid impacts to GERA and therefore would protect the major population of southern tarplant.	Consistent. B-8 would be consistent because it would avoid impacts to GERA and therefore would protect the major population of southern tarplant.	Consistent. B-10M would be consistent because it would avoid impacts to GERA and therefore would protect the major population of southern tarplant.	Consistent. B-12 would be consistent because it would avoid impacts to GERA and therefore would protect the major population of southern tarplant.
39. Consistent with the Species Accounts recommendations and the Planning Recommendations for the Chiquita sub-basin, protect at least 80 percent of the coastal sage scrub and gnatcatcher sites along the eastern slopes of Chiquadora Ridge to contribute to achieving the overall goal of protecting at least 80 percent of the major population of gnatcatchers extending from Chiquita Canyon across to Gobernadora Creek. A further goal is the maintenance of connectivity between the protected coastal sage scrub patches to allow for dispersal of gnatcatchers between patches.	Consistent. A-5 would be consistent because all 35 gnatcatcher locations on Chiquadora Ridge and 91% of coastal sage scrub would be protected. However, connectivity between coastal sage scrub patches would be affected by this alternative.	Consistent. B-8 would be consistent because it would protect 100% of existing coastal sage scrub and 100% of gnatcatcher locations. Connectivity among protected coastal sage scrub would be maintained.	Not Consistent. B-10M would not be consistent because it would protect 57% of existing coastal sage scrub and 68% of gnatcatcher locations. However, connectivity among protected coastal sage scrub would be maintained.	Not Consistent. B-12 would not be consistent because it would protect 56% of existing coastal sage scrub and 63% of gnatcatcher locations. However, connectivity among protected coastal sage scrub would be maintained.
Gobernadora Canyon Sub-basin Management Recommendations				
40. Implement a cowbird trapping program to mitigate for impacts to existing habitat within the sub-basin and for potential impacts associated with future development. The cowbird trapping program will be evaluated on an annual basis and trap locations and trapping effort will be adjusted as part of the overall Adaptive Management Program (e.g., if the number of trapped cowbirds drops to a prescribed threshold, the trapping	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program.	Could be Consistent. B-8 could be consistent if an additional funding source were identified to implement the Adaptive Management Program, including cowbird trapping as part of the Invasive Species Control Plan component	Consistent. B-10M would be consistent because it proposes implementation of an Adaptive Management Program which includes cowbird trapping as part of the Invasive Species Control Plan.	Consistent. B-12 would be consistent because it proposes implementation of an Adaptive Management Program which includes cowbird trapping as part of the Invasive Species Control Plan.

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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
program may be terminated or otherwise modified).				
41. Protect existing riparian habitat downstream of the knickpoint in GERA for the least Bell's vireo, southwestern willow flycatcher and other riparian nesting bird species.	Consistent. A-5 could be consistent because it would avoid impacts to GERA and upstream development.	Consistent. B-8 would be consistent because it would avoid GERA and upstream development.	Consistent. B-10M would be consistent because it would avoid GERA and upstream development.	Consistent. B-12 would be consistent because it would avoid GERA and upstream development.
42. Protect downstream habitat for the arroyo toad, least Bell's vireo, arroyo chub, and other sensitive riparian and aquatic species by maintaining hydrology, water quality and sediment delivery in San Juan Creek and minimizing additional loadings of nutrients or toxics.	Could be Consistent. A-5 could be consistent through implementation of water quality management measures through the DAMP.	Could be Consistent. B-8 could be consistent because management of water quality would occur in compliance with the Water Quality Management Plan.	Could be Consistent. B-10M could be consistent because management of water quality would occur in compliance with the Water Quality Management Plan.	Could be Consistent. B-12 could be consistent because management of water quality would occur in compliance with the Water Quality Management Plan.
43. Implement a management program for protected sensitive plant locations in the sub-basin, including control of non-native invasive species, management of grazing as part of the Adaptive Management Program, and prevention of human disturbance.	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program.	Could be Consistent. B-8 could be consistent if additional funding were identified to implement the Adaptive Management Program.	Consistent. B-10M would be consistent because it proposes implementation of an Adaptive Management Program which includes an Invasive Species Control Plan. The B-10M would implement a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 11.	Consistent. B-12 would be consistent because it proposes implementation of an Adaptive Management Program which includes an Invasive Species Control Plan. The B-10M would implement a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 11.
Gobernadora Sub-basin Restoration Recommendations				
44. Implement a coastal sage scrub restoration program in Sulphur Canyon to enhance habitat connectivity and mitigate for impacts to existing habitat associated with future development.	Not Consistent. A-5 would not be consistent because it does propose implementation of the Adaptive Management Program and its Habitat Restoration Component.	Could be Consistent. B-8 could be consistent if additional funding were identified to implement the Adaptive Management Program, including the Habitat Restoration Plan component.	Consistent. B-10M would be consistent because it proposes no development in Sulphur Canyon and would implement an Adaptive Management Program that includes a Habitat Restoration Plan that targets Sulphur Canyon for coastal sage scrub restoration.	Consistent. B-12 would be consistent because it proposes no development in Sulphur Canyon and would implement an Adaptive Management Program that includes a Habitat Restoration Plan that targets Sulphur Canyon for coastal sage scrub restoration.
45. Translocate salvaged many-stemmed dudleya to CSS/VGL restoration and enhancement areas where feasible and appropriate. Potential restoration	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program, including salvage and translocation	Could be Consistent. B-8 could be consistent if additional funding were identified to implement the Adaptive	Consistent. B-10M would be consistent because it proposes development in this sub-basin consistent with implementation of the	Consistent. B-12 would be consistent because it proposes development in this sub-basin consistent with implementation of

TABLE 8-1
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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
and enhancement areas in the sub-basin include Chiquadora Ridge. Receiver areas should support clay soils suitable for dudleya and should be placed in locations that maximize connectivity and genetic exchange.	of many-stemmed dudleya.	Management Program, including the Habitat Restoration Plan component.	CSS/VGL restoration recommendations via implementation of the Adaptive Management Program and the Translocation, Propagation and Management Plan for Special-status Plant Species.	the CSS/VGL restoration recommendations via implementation of the Adaptive Management Program and the Translocation, Propagation and Management Plan for Special-status Plant Species.
46. Salvage clay topsoils from development areas where feasible and appropriate and transport to restoration areas. Salvaged topsoils may be used to create additional suitable dudleya habitat and may contain seedbank.	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program, including salvage and translocation clay topsoils.	Could be Consistent. B-8 could be consistent because it proposes development in this sub-basin consistent with implementation of CSS/VGL restoration recommendations via implementation of the Adaptive Management Program and the Translocation, Propagation and Management Plan for Special-status Plant Species. To be consistent additional funding would need to be identified to implement the Adaptive Management Program, including the Habitat Restoration Plan component.	Consistent. B-10M would be consistent because it proposes development in this sub-basin consistent with implementation of the CSS/VGL restoration recommendations via implementation of the Adaptive Management Program and the Translocation, Propagation and Management Plan for Special-status Plant Species.	Consistent. B-12 would be consistent because it proposes development in this sub-basin consistent with implementation of the CSS/VGL restoration recommendations via implementation of the Adaptive Management Program and the Translocation, Propagation and Management Plan for Special-status Plant Species.
49. Implement a restoration program in Gobernadora Creek which addresses (1) the historic creek meander above the knickpoint; and (2) upstream land use induced channel incision and erosion, including potentially excessive surface and groundwater originating upstream.	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program, including the Habitat Restoration Plan component.	Could be Consistent. B-8 could be consistent, but would require additional funding to implement the Adaptive Management Program, including the Habitat Restoration Plan component.	Consistent. B-10M would be consistent because it would implement the Habitat Restoration Plan component of the Adaptive Management Program.	Consistent. B-12 would be consistent because it would implement the Habitat Restoration Plan component of the Adaptive Management Program.
CENTRAL SAN JUAN AND TRAMPAS CANYON SUB-BASIN				
Central San Juan Subunit Protection Recommendations				
50. Maintain and manage riparian and aquatic habitats along San Juan Creek for breeding populations of the arroyo toad, least Bell's vireo, and other sensitive species such as yellow	Not Consistent. A-5 would not be consistent because although it would avoid riparian and aquatic habitats along San Juan Creek, no Adaptive Management Program is proposed.	Could be Consistent. B-8 could be consistent because it would avoid riparian and aquatic habitats along San Juan Creek thereby maintaining these	Consistent. B-10M would be consistent because it would avoid riparian and aquatic habitats along San Juan Creek and management would occur through implementation	Consistent. B-12 would be consistent because it would avoid riparian and aquatic habitats along San Juan Creek and management would occur through

TABLE 8-1
DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
warbler, yellow-breasted chat, raptors, southwestern pond turtle, two-striped garter snake, western spadefoot toad, silvery legless lizard, arroyo chub and threespine stickleback.		habitats. Management of water quality would occur in compliance with the Water Quality Management Plan. Water quality would be adaptively managed by the development entities as described in Chapter 9. The B-8 would also implement a Grazing Management Plan. For B-8 to be consistent, additional funding would need to be identified to implement the Adaptive Management Program, particularly the Invasive Species Control Plan and Habitat Restoration Plan.	of the Adaptive Management Program, including the Invasive Species Control Plan, and Habitat Restoration Plan. The B-10M would also implement a Grazing Management Plan. Management of water quality would occur in compliance with the Water Quality Management Plan.	implementation of the Adaptive Management Program, including the Invasive Species Control Plan, Habitat Restoration Plan. The B-12 would also implement a Grazing Management Plan. Management of water quality would occur in compliance with the Water Quality Management Plan.
51. Provide upland foraging and estivation habitat within the upland terraces in the floodplain of San Juan Creek, with a particular focus on the south side of the creek, to maintain existing population levels of the arroyo toad.	Not Consistent. A-5 would not be consistent because while it would avoid San Juan Creek and adjacent floodplain terraces foraging habitat, proposed development on the south side of the creek would only be set back 300 ft from the creek.	Consistent. B-8 would be consistent because it would avoid San Juan Creek and adjacent floodplain terrace foraging habitat. Proposed development on the south side of the creek would be limited to the Trampas sub-basin and this development would be set back from the creek.	Not Consistent. B-10M would not be consistent because while it would avoid San Juan Creek and adjacent floodplain terrace foraging/estivation habitat, proposed development on the south side of the creek would only be set back 300 ft from the creek.	Consistent. B-12 would be consistent because it would avoid San Juan Creek and adjacent floodplain terrace foraging/estivation habitat. Proposed development on the south side of the creek would be limited to the Trampas sub-basin and within the Central San Juan sub-basin to an area that would be set back 656 ft (200 m) from the creek as specified in proposed SAMP EIS Special Condition I.D.2 which sets forth standards for the setback.
52. Protect upland habitat adjoining riparian and aquatic habitats to support nesting sites of southwestern pond turtle.	Consistent. A-5 would be consistent because it would avoid San Juan Creek and adjacent floodplain terraces suitable for nesting/estivation habitat.	Consistent. B-8 would be consistent because it would avoid San Juan Creek and adjacent floodplain terrace nesting/estivation habitat. Proposed development on the south side of the creek would be	Consistent. B-10M would be consistent because it would avoid San Juan Creek and adjacent floodplain terrace nesting/estivation habitat. Proposed development on the south side of the creek would be limited to the Trampas sub-basin and	Consistent. B-12 would be consistent because it would avoid San Juan Creek and adjacent floodplain terrace nesting/estivation habitat. Proposed development on the south side of the creek would be limited to the

TABLE 8-1
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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
		limited to the Trampas sub-basin and this development would be set back from the creek.	within the Central San Juan sub-basin to an area that would be set back 300 ft from the creek.	Trampas sub-basin and within the Central San Juan sub-basin to an area that would be set back 656 ft (200 m) from the creek as specified in proposed SAMP EIS Special Condition I.D.2 which sets forth standards for the setback. .
53. Protect upland habitat adjoining riparian and aquatic habitats to support all life stages of western spadefoot toad.	Consistent. A-5 would be consistent because it would avoid San Juan Creek and adjacent floodplain terraces estivation habitat.	Consistent. B-8 would be consistent because it would avoid San Juan Creek and adjacent floodplain terrace estivation habitat.	Consistent. B-10M would be consistent because it would avoid San Juan Creek and adjacent floodplain terrace estivation habitat.	Consistent. B-12 would be consistent because it would avoid San Juan Creek and adjacent floodplain terrace estivation habitat.
54. Protect breeding habitat and, to the extent feasible, protect foraging habitat for raptors adjacent to San Juan Creek.	Not Consistent. A-5 would not be consistent because although breeding habitat in San Juan Creek and the major adjacent tributaries would be protected, impacts to adjacent foraging habitat in the lower Chiquita, Gobernadora, Trampas and Central San Juan sub-basins would occur as a result of the A-5 development pattern.	Not Consistent. B-8 would not be consistent because although breeding habitat in San Juan Creek and adjacent major tributaries (e.g., Chiquita, Gobernadora) and foraging habitat in the Chiquita sub-basin would be protected, as would foraging habitat in Central San Juan, impacts to foraging habitat in Gobernadora and Trampas sub-basins would occur as a result of the B-8 development pattern.	Not Consistent. B-10M would not be consistent because although breeding habitat in San Juan Creek and the major adjacent tributaries would be protected, impacts to adjacent foraging habitat in the lower Chiquita, Gobernadora, Trampas and Central San Juan sub-basins would occur as a result of the B-10M development pattern.	Not Consistent. B-12 would not be consistent because although breeding habitat in San Juan Creek and the major adjacent tributaries would be protected, impacts to adjacent foraging habitat in the lower Chiquita, Gobernadora, Trampas and Central San Juan sub-basins would occur as a result of the B-12 development pattern.
55. Provide floodplain and upland habitat linkages adjacent to San Juan Creek for east-west and north-south dispersal by the California gnatcatcher between the Chiquita Canyon and Cristianitos sub-basins.	Consistent. A-5 would be consistent because it would provide for upland habitat linkages in an east-west direction by the protection of San Juan Creek and adjacent floodplain terraces (linkage J). The north-south movement would be provided by protection of Chiquita (C) and Chiquadora (G) ridges, protection of San Juan Creek (J) and adjacent floodplain terraces and protection of the coastal sage scrub and gnatcatcher sites located in the	Consistent. B-8 would be consistent because linkages along Chiquita Ridge (C), Chiquadora Ridge (G), San Juan Creek (J) and Cristianitos (N) would be protected.	Consistent. B-10M would be consistent because it would provide for upland habitat linkages in an east-west direction by the protection of San Juan Creek and adjacent floodplain terraces (linkage J). The north-south movement would be provided by protection of Chiquita (C) and Chiquadora (G) ridges, protection of San Juan Creek (J) and adjacent floodplain terraces and protection of the coastal sage scrub and gnatcatcher sites located in the	Consistent. B-12 would be consistent because it would provide for upland habitat linkages in an east-west direction by the protection of San Juan Creek and adjacent floodplain terraces (linkage J). The north-south movement would be provided by protection of Chiquita (C) and Chiquadora (G) ridges, protection of San Juan Creek (J) and adjacent floodplain terraces and protection of the coastal sage

TABLE 8-1
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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
	northern portion of the Cristianitos sub-basin (N).		northern portion of the Cristianitos sub-basin (N).	scrub and gnatcatcher sites located in the northern portion of the Cristianitos sub-basin (N).
56. Provide a habitat linkage at the confluences of Verdugo Canyon and Bell Canyon with San Juan Creek. Maintain an adequate habitat linkage along central San Juan Creek for "live-in" dispersal and movement habitat for terrestrial species, including mountain lion, bobcat, coyote and mule deer between sub-basins and especially between Chiquita Ridge, Canada Gobernadora, Bell Canyon, upper San Juan Creek, Verdugo Canyon, Trampas Canyon and Cristianitos Canyon.	Not Consistent. A-5 would not be consistent because proposed development along San Juan Creek would only provide for a minimum 300-ft setback at its narrowest point and thus provide for a minimum linkage width of about 900 ft, inconsistent with Beier (1995) recommendations.	Consistent. B-8 would be consistent because linkages along San Juan Creek would be protected consistent with Beier (1995) recommendations.	Not Consistent. B-10M would not be consistent because proposed development along San Juan Creek would only provide for a minimum 300-ft setback at its narrowest point and thus provide for a minimum linkage width of about 900 ft, inconsistent with Beier (1995) recommendations.	Consistent. B-12 would be consistent because proposed development along San Juan Creek would provide for 400 meter total setback at its narrowest point and thus provide for a minimum linkage width of about 1310 ft, consistent with Beier (1995) recommendations as specified in proposed SAMP EIS Special Condition I.D.2 which sets forth standards for the setback.
Central San Juan Subunit Management Recommendations				
58. Implement a bullfrog control program for the Cal-Mat Lake within San Juan Creek to help protect arroyo toads.	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program.	Could be Consistent. B-8 could be consistent if additional funding to implement the Adaptive Management Program, including the Invasive Species Control Plan, was identified.	Consistent. B-10M would be consistent because it proposes implementation of an Adaptive Management Program which includes bullfrog control as part of the Invasive Species Control Plan.	Consistent. B-12 would be consistent because it proposes implementation of an Adaptive Management Program which includes bullfrog control as part of the Invasive Species Control Plan.
59. Implement a management program for protected sensitive plant locations in the sub-basin, including control of non-native invasive species, management of grazing as part of the Adaptive Management Program, and prevention of human disturbance.	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program.	Could be Consistent. B-8 could be consistent if additional funding to implement the Adaptive Management Program, including the Invasive Species Control Plan, was identified.	Consistent. B-10M would be consistent because it proposes implementation of an Adaptive Management Program which includes an Invasive Species Control Plan. B-10M would implement a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 11.	Consistent. B-12 would be consistent because it proposes implementation of an Adaptive Management Program which includes an Invasive Species Control Plan. B-12 would implement a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 11.
Central San Juan Subunit Restoration Recommendations				
60. In coordination with upstream eradication efforts, implement a giant	Not Consistent. A-5 would not be consistent because proposes no	Could be Consistent. B-8 could be consistent if additional	Consistent. B-10M would be consistent because it proposes	Consistent. B-12 would be consistent because it proposes

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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
reed control program for San Juan Creek within Rancho Mission Viejo boundaries to protect arroyo toad habitat and other riparian areas.	Adaptive Management Program.	funding to implement the Adaptive Management Program, including the Invasive Species Control Plan, was identified.	implementation of an Adaptive Management Program which includes giant reed control as part of the Invasive Species Control Plan.	implementation of an Adaptive Management Program which includes giant reed control as part of the Invasive Species Control Plan.
61. Translocate salvaged many-stemmed dudleya to CSS/VGL restoration and enhancement areas where feasible and appropriate. Potential nearby restoration and enhancement include Chiquadora Ridge. Receiver areas should support clay soils suitable for many-stemmed dudleya and should be placed in locations that maximize connectivity and genetic exchange.	Could be Consistent. A-5 could be consistent if impacted dudleya were relocated to CSS/VGL restoration and enhancement areas pursuant to a CEQA mitigation requirement.	Could be Consistent. B-8 could be consistent if additional funding to implement the Adaptive Management Program, including the Translocation, Propagation and Management Plan for Special-status Plant Species, was identified.	Consistent. B-10M would be consistent because it proposes implementation of an Adaptive Management Program which includes many-stemmed dudleya salvage and translocation to Chiquadora Ridge as part of the Translocation, Propagation and Management Plan for Special-status Plant Species.	Consistent. B-12 would be consistent because it proposes implementation of an Adaptive Management Program which includes many-stemmed dudleya salvage and translocation to Chiquadora Ridge as part of the Translocation, Propagation and Management Plan for Special-status Plant Species.
62. Salvage clay topsoils from development areas where feasible and appropriate and transport to restoration areas. Salvaged topsoils may be used to create additional suitable dudleya habitat and may contain seedbank.	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program.	Could be Consistent. B-8 could be consistent if additional funding to implement the Adaptive Management Program, including the Translocation, Propagation and Management Plan for Special-status Plant Species, was identified.	Consistent. B-10M would be consistent because it would implement the Translocation, Propagation and Management Plan for Special-status Plant Species as part of the Adaptive Management Program.	Consistent. B-12 would be consistent because it would implement the Translocation, Propagation and Management Plan for Special-status Plant Species as part of the Adaptive Management Program.
Trampas Canyon Subunit Protection Recommendation				
65. Protect the vernal pools and their contributing hydrologic sources, Riverside fairy shrimp and San Diego fairy shrimp, as well as the slope wetlands and their primary sub-surface water supply recharge characteristics along Radio Tower Road.	Consistent. A-5 would be consistent because it would avoid wetlands, including vernal pools supporting fairy shrimp and slope wetlands and their contributing hydrological sources.	Not Consistent. B-8 would not be consistent because it would impact the vernal pools and their hydrology sources. Avoidance measures are not feasible because of the reduced development acreage available under this alternative.	Consistent. B-10M would be consistent because it would protect the Radio Tower Road vernal pools and slope wetlands and their contributing hydrologic sources through implementation of GPA/ZC EIR mitigation measure 4.9-35 which requires avoidance of all vernal pools in the Trampas sub-basin.	Consistent. B-12 would be consistent because it would protect the Radio Tower Road vernal pools and slope wetlands and their contributing hydrologic sources through implementation of GPA/ZC EIR mitigation measure 4.9-35 which requires avoidance of all vernal pools in the Trampas sub-basin.
66. Avoid impacts to the important populations of California gnatcatchers and coastal sage scrub to the maximum extent feasible to maintain	Not Consistent. A-5 would not be consistent because although it would avoid impacts to the gnatcatcher locations within this important	Consistent. B-8 would be consistent because it would avoid important population 9 (Trampas Canyon) and 11	Consistent. B-10M would be consistent because it would avoid important population 9 (Trampas Canyon) and important population	Consistent. B-12 would be consistent because it would avoid important population 9 (Trampas Canyon) and important population

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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
resident and dispersal habitat for the gnatcatcher between San Juan Creek and Cristianitos Canyon and populations on Camp Pendleton.	population, proposed development in the area would fragment habitat and potentially disrupt dispersal patterns.	(upper Cristianitos Canyon). B-8 thus would provide for resident and dispersal habitat from San Juan Creek through the Trampas sub-basin to the Cristianitos sub-basin southward to Camp Pendleton.	11 (upper Cristianitos Canyon). B-10M thus would provide for resident and dispersal habitat from San Juan Creek through the Trampas sub-basin to the Cristianitos sub-basin southward to Camp Pendleton.	11 (upper Cristianitos Canyon). B-12 thus would provide for resident and dispersal habitat from San Juan Creek through the Trampas sub-basin to the Cristianitos sub-basin southward to Camp Pendleton.
67. Maintain upland north-south habitat linkages through the central and western portions of the Trampas Canyon subunit to convey wildlife movement and dispersal (especially gnatcatchers) between San Juan Creek, San Juan Capistrano, San Clemente, Cristianitos Canyon, the Donna O'Neill Conservancy at Rancho Mission Viejo and Camp Pendleton.	Not Consistent. A-5 would not be consistent because the development pattern of A-5 is such that extensive habitat fragmentation would occur and would most likely affect wildlife movement and gnatcatcher dispersal through the area.	Consistent. B-8 would be consistent because it would protect the north-south habitat linkages J, K and N.	Consistent. B-10M would be consistent because it would provide for the protection of north-south habitat linkages J and K and minimize impacts to linkage N through flexible golf course design and provision of a setback from Cristianitos Creek.	Consistent. B-12 would be consistent because it would provide for the protection of north-south habitat linkages J, K and N.
68. Maintain upland east-west habitat linkage/wildlife corridor south of the artificial lake to link Prima Deshecha, Talega Open Space and other habitat to the west in San Juan Capistrano and San Clemente with the Donna O'Neill Land Conservancy and the Gabino, La Paz and Talega movement corridors. This habitat linkage should allow for dispersal of gnatcatchers and other avian species, as well as provide a movement corridor for large mammals such as bobcat, coyote, and mule deer.	Not Consistent. A-5 would not be consistent because the development pattern of A-5 is such that extensive habitat fragmentation would occur and would most likely disrupt wildlife movement and gnatcatcher dispersal through the area.	Not Consistent. B-8 would not be consistent because the east-west portion of habitat linkage K south of Trampas Canyon Dam, which links to Prima Deshecha, Talega Open Space and other habitat to the west in San Juan Capistrano and San Clemente, would be constrained.	Not Consistent. B-10M would not be consistent because the east-west portion of habitat linkage K south of Trampas Canyon Dam, which links to Prima Deshecha, Talega Open Space and other habitat to the west in San Juan Capistrano and San Clemente, would be constrained.	Not Consistent. B-12 would not be consistent because the east-west portion of habitat linkage K south of Trampas Canyon Dam, which links to Prima Deshecha, Talega Open Space and other habitat to the west in San Juan Capistrano and San Clemente, would be constrained.
70. Maintain and manage riparian and aquatic habitats along San Juan Creek for arroyo toad, least Bell's vireo, and other sensitive species such as yellow warbler, yellow-breasted chat, raptors, southwestern pond turtle, two-striped garter snake,	Not Consistent. A-5 would not be consistent because although it would avoid riparian and aquatic habitats along San Juan Creek, no Adaptive Management Program is proposed.	Could be Consistent. B-8 could be consistent because it would avoid riparian and aquatic habitats along San Juan Creek thereby maintaining these habitats. Management of water quality would occur in	Consistent. B-10M would be consistent because it would avoid riparian and aquatic habitats along San Juan Creek and management would occur through implementation of the Adaptive Management Program, including the Invasive	Consistent. B-12 would be consistent because it would avoid riparian and aquatic habitats along San Juan Creek and management would occur through implementation of the Adaptive Management Program, including

TABLE 8-1
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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
western spadefoot toad, silvery legless lizard, arroyo chub and threespine stickleback.		compliance with Water Quality Management Plan. However, to be consistent additional funding would need to be identified to implement the Adaptive Management Program, particularly the Invasive Species Control Plan and Habitat Restoration Plan.	Species Control Plan, Habitat Restoration Plan. B-10M would implement a Grazing Management Plan. Management of water quality would occur in compliance with the Water Quality Management Plan.	the Invasive Species Control Plan, Habitat Restoration Plan. B-12 would implement a Grazing Management Plan. Management of water quality would occur in compliance with the Water Quality Management Plan
71. Protect upland terraces and habitat adjoining San Juan Creek to support arroyo toad foraging and estivation. (Based on radio telemetry tracking, the majority of toad activity is confined to the flood prone areas of San Juan Creek.)	Consistent. A-5 would be consistent because it would avoid the upland terraces within 300 feet of the 100-year floodplain of San Juan Creek and therefore would protect arroyo toad breeding and estivation habitat.	Consistent. B-8 would be consistent because it would avoid the upland terraces within the 100-year floodplain of San Juan Creek and therefore protect arroyo toad breeding and estivation habitat.	Consistent. B-10M would be consistent because it would avoid the upland terraces within 300 feet of the 100-year floodplain of San Juan Creek and therefore would protect arroyo toad breeding and estivation habitat.	Consistent. B-12 would be consistent because it would avoid the upland terraces within 656 ft (200 m) of San Juan Creek and therefore would protect arroyo toad breeding and estivation habitat as specified in proposed SAMP EIS Special Condition I.D.2 which sets forth standards for the setback.
72. Protect the Trampas Canyon subunit component (approximately nine discrete locations) of the major population of many-stemmed dudleya that extends from the southern portion of the Trampas Canyon in the north, through the Cristianitos Canyon sub-basin south to the Talega development open space located in the San Clemente Watershed.	Consistent. A-5 would be consistent because it would avoid the locations of many-stemmed dudleya in the Trampas Canyon subunit.	Consistent. B-8 would be consistent because it would avoid the locations of many-stemmed dudleya in the Trampas Canyon subunit.	Consistent. B-10M would be consistent because it would avoid the locations of many-stemmed dudleya in the Trampas Canyon subunit.	Consistent. B-12 would be consistent because it would avoid the locations of many-stemmed dudleya in the Trampas Canyon subunit.
Trampas Canyon Subunit Management Recommendations				
74. Maintain stormwater flow characteristics comparable to existing conditions from Trampas Canyon into San Juan Creek to preserve breeding habitat for the arroyo toad population and other aquatic species in San Juan Creek.	Could be Consistent. A-5 could be consistent because it would maintain stormwater flow characteristics comparable to existing conditions from Trampas Canyon into San Juan Creek through implementation of the Water Quality Management Plan.	Could be Consistent. B-8 could be consistent because it would maintain stormwater flow characteristics comparable to existing conditions from Trampas Canyon into San Juan Creek through implementation of the Water Quality Management Plan	Could be Consistent. B-10M could be consistent because it would maintain stormwater flow characteristics comparable to existing conditions from Trampas Canyon into San Juan Creek through implementation of the Water Quality Management Plan.	Could be Consistent. B-12 could be consistent because it would maintain stormwater flow characteristics comparable to existing conditions from Trampas Canyon into San Juan Creek through implementation of the Water Quality Management Plan.

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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
75. Implement a management program for protected sensitive plant locations in the sub-basin, including control of non-native invasive species, management of grazing as part of the Adaptive Management Program, and prevention of human disturbance.	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program.	Could be Consistent. B-8 could be consistent if additional funding to implement the Adaptive Management Program, including an Invasive Species Control Plan was identified. In addition, access policies will be implemented to control human disturbances, as described in Chapter 11.	Consistent. B-10M would be consistent because it would implement an Adaptive Management Program which includes an Invasive Species Control Plan. B-10M would implement a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 11.	Consistent. B-12 would be consistent because it would implement an Adaptive Management Program which includes an Invasive Species Control Plan. B-12 would implement a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 11.
<i>Verdugo Canyon Sub-basin Protection Recommendations</i>				
76. Protect, to the extent feasible, patches of coastal sage scrub and patches of southern cactus scrub that support cactus wren with a focus on maintaining contiguous habitat patches that provide north-south dispersal opportunities for the cactus wren and other species between the Lucas Canyon sub-basin to the north, and the Gabino Canyon/Blind Canyon and La Paz sub-basins to the south.	Consistent. A-5 would be consistent because it would maintain adequate contiguous patches of coastal sage scrub around proposed estate lots to provide dispersal habitat for the cactus wren and other species between the Lucas Canyon sub-basin to the north, and the Gabino Canyon/Blind Canyon and La Paz sub-basins to the south.	Consistent. B-8 would be consistent because it proposes no development in the sub-basin and thus would protect contiguous coastal sage scrub to provide dispersal habitat for the cactus wren and other species between the Lucas Canyon sub-basin to the north, and the Gabino Canyon/Blind Canyon and La Paz sub-basins to the south.	Consistent. B-10M would be consistent because it would protect adequate contiguous coastal sage scrub in the eastern portion of the sub-basin to provide dispersal habitat for the cactus wren and other species between the Lucas Canyon sub-basin to the north, and the Gabino Canyon/Blind Canyon and La Paz sub-basins to the south.	Consistent. B-12 would be consistent because it would protect adequate contiguous coastal sage scrub in the eastern portion of the sub-basin to provide dispersal habitat for the cactus wren and other species between the Lucas Canyon sub-basin to the north, and the Gabino Canyon/Blind Canyon and La Paz sub-basins to the south.
77. Maintain habitat connectivity for movement of large mammals such as mountain lion, bobcat, coyote and mule deer between San Juan Creek and Cleveland National Forest; and between upper Verdugo Canyon and the headwaters of Gabino Creek.	Not Consistent. A-5 would not be consistent because the proposed development pattern of A-5 would include development in headwaters of Gabino Creek which would affect wildlife movement between Gabino, Verdugo, San Juan Creek and the CNF.	Consistent. B-8 would be consistent because no development would occur in the sub-basin under B-8, providing for unobstructed habitat connectivity along San Juan Creek to the CNF (linkage J), and between upper Verdugo Canyon and the headwaters of Gabino Creek (linkage M).	Consistent. B-10M would be consistent because it would provide for habitat connectivity along San Juan Creek to the CNF (linkage J). Impacts to the confluence of Bell, San Juan and Verdugo would be minimized by the inclusion of setbacks in development areas north and south of San Juan Creek. Habitat connectivity between upper Verdugo Canyon and the headwaters of Gabino Creek (M) would be protected as limited development is proposed in the Gabino sub-basin and in Verdugo	Consistent. B-12 would be consistent because it would provide for habitat connectivity along San Juan Creek to the CNF (linkage J). Impacts to the confluence of Bell, San Juan and Verdugo would be minimized by the inclusion of setbacks in development areas north and south of San Juan Creek. Habitat connectivity between upper Verdugo Canyon and the headwaters of Gabino Creek (M) would be protected as no development is proposed in the

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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
			Creek and upper Verdugo Canyon. Proposed estate lots would be at least 1,000 feet west of Gabino Creek and no development would occur east of the creek, providing for a large block of unfragmented habitat in upper Gabino.	Gabino sub-basin and in Verdugo Creek and upper Verdugo Canyon.
78. Protect riparian habitat that provides nest sites for Cooper's hawk, red-tailed hawk, red-shouldered hawk and barn owl.	Consistent. A-5 would be consistent because it would avoid impacts to raptor riparian breeding habitat in the sub-basin.	Consistent. B-8 would be consistent because no development would occur in the sub-basin.	Consistent. B-10M would be consistent because it would avoid impacts to raptor riparian breeding habitat in the sub-basin.	Consistent. B-12 would be consistent because it would avoid impacts to raptor riparian breeding habitat in the sub-basin.
79. Protect grassland and wetland/riparian habitat at the mouth of Verdugo Canyon near Ortega Highway to retain tricolored blackbird habitat and to provide for wildlife movement to San Juan Creek.	Not Consistent. A-5 would not be consistent because while it would avoid impacts to wetland/riparian habitat at the mouth of Verdugo Canyon, proposed development at the mouth of the canyon would impact grassland habitat.	Consistent. B-8 would be consistent because no development would occur in the sub-basin.	Not Consistent. B-10M would not be consistent because while wetland/riparian and grassland habitat north of the canyon would be protected, the patch of grassland in the southern portion of the mouth of the canyon would be developed.	Not Consistent. B-12 would not be consistent because while wetland/riparian and grassland habitat north of the canyon would be protected, the patch of grassland in the southern portion of the mouth of the canyon would be developed.
80. Protect Verdugo Canyon hydrology to maintain sources of coarse sediment that are important for arroyo toad breeding habitat in downstream areas.	Could be Consistent. A-5 could be consistent because it would maintain existing hydrology in Verdugo Canyon as development would be set back from regulated waters.	Consistent. B-8 would be consistent because it proposes no development in the sub-basin.	Consistent. B-10M would be consistent because it would maintain existing hydrology in Verdugo Canyon, and, therefore, would protect the primary sources of coarse sediment in the canyon.	Consistent. B-12 would be consistent because it would maintain existing hydrology in Verdugo Canyon, and, therefore, would protect the primary sources of coarse sediment in the canyon.
SAN MATEO CREEK WATERSHED				
<i>Cristianitos Canyon Sub-basin Protection Recommendations</i>				
81. Protect a habitat linkage, consisting of the Donna O'Neill Land Conservancy and an area along the east side of Cristianitos Creek, to provide connectivity for gnatcatchers in the upper portion of the sub-basin with other populations in Lower Gabino Creek and Camp Pendleton along lower Cristianitos/San Mateo Creek, and to maintain habitat integrity through connectivity within the Donna O'Neill Land Conservancy at Rancho	Not Consistent. A-5 would not be consistent because it proposes substantial development within the sub-basin and would not provide for a habitat linkage along the east side of Cristianitos Creek.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore this habitat linkage would be protected.	Consistent. B-10M would be consistent because it would provide a minimum 200 ft setback from the east side of Cristianitos Creek which when combined with the O'Neill Conservancy would form a north-south habitat linkage. In addition the proposed golf course could provide for the restoration of native habitats such as CSS and VGL to further enhance the linkage. B-10M also would maintain habitat integrity	Consistent. B-12 would be consistent because it proposes limited development consisting of 25 acres for relocation of the RMV HQ and an additional 50 acres of orchard within the Cristianitos sub-basin; therefore this habitat linkage would be protected.

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DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
Mission Viejo.			through connectivity within the O'Neill Conservancy.	
82. Protect appropriate wetland and upland habitats to support a nesting population of the southwestern pond turtle, which occurs in the upper portion of the watershed in a small stockpond along Cristianitos Creek.	Consistent. A-5 would be consistent because it avoids the stockpond and therefore impacts to breeding and nesting/estivation habitat for the pond turtle.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore the stockpond would be protected.	Consistent. B-10M would be consistent because it avoids the stockpond and therefore impacts to breeding and nesting/estivation habitat for the pond turtle.	Could be Consistent. B-12 could be consistent because it avoids the stockpond. The 50 acres of orchard in Planning Areas 6 and/or 7 could be sited to avoid nesting/estivation habitat for the pond turtle.
83. Protect wetlands and adjoining upland habitat to support all life stages of western spadefoot toad.	Consistent. A-5 would be consistent because it avoids wetlands associated with Cristianitos Creek and therefore avoid impacts to breeding and estivation habitat for the spadefoot in the stockpond in upper Cristianitos Creek. Impacts to the remainder of Cristianitos Creek downstream would also be avoided.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed and therefore breeding and estivation habitat for the western spadefoot toad would be protected.	Consistent. B-10M would be consistent because it avoids wetlands associated with Cristianitos Creek and therefore avoid impacts to breeding and estivation habitat for the spadefoot in the stockpond in upper Cristianitos Creek. Impacts to the remainder of Cristianitos Creek downstream would also be avoided.	Could be Consistent. B-12 could be consistent because it avoids wetlands associated with Cristianitos Creek. The 50 acres of orchard in Planning Areas 6 and/or 7 could be sited to avoid estivation habitat for the spadefoot in the stockpond in upper Cristianitos Creek. Impacts to the remainder of Cristianitos Creek downstream would also be avoided.
84. Avoid riparian/wetland habitat, including alkali wetlands, to the maximum extent feasible.	Consistent. A-5 would be consistent because as a regulated waters avoidance alternative, it would avoid regulated wetland/riparian habitats within the sub-basin.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore all wetlands in the Cristianitos sub-basin would be avoided.	Consistent. B-10M would be consistent because it avoids wetlands associated with Cristianitos Creek.	Consistent. B-12 would be consistent because it avoids wetlands associated with Cristianitos Creek.
85. Protect the majority of native grasslands in the sub-basin.	Not Consistent. A-5 would not be consistent because the proposed development pattern is such that regulated wetland/riparian habitats would be avoided in favor of impacts to upland habitats. A-5 therefore would concentrate development in the grasslands of the sub-basin.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore 100% of native grasslands in the Cristianitos sub-basin would be protected.	Consistent. B-10M would be consistent because approximately 64% of native grasslands in the Cristianitos sub-basin would be protected. B-10M also would provide for 60 ac native habitat restoration in association with the golf course.	Consistent. B-12 would be consistent because it proposes limited development (25 acres for Ranch HQ and 50 acres of orchards) within the Cristianitos sub-basin; therefore the majority of native grasslands in the sub-basin would be protected.
86. Protect breeding habitat and, to the extent feasible, foraging habitat for resident and wintering raptor species.	Not Consistent. A-5 would not be consistent because while it would avoid jurisdictional riparian areas that support breeding raptors, it would	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek	Not Consistent. B-10M would not be consistent because while riparian breeding habitat associated with Cristianitos Creek would be avoided,	Consistent. B-12 would be consistent because it proposes limited development (25 acres for relocation of Ranch HQ and 50

TABLE 8-1
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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
	impact adjacent upland foraging habitats used by resident and wintering raptors.	Watershed, and therefore raptor breeding and foraging habitat would be protected.	substantial impacts to adjacent grassland foraging habitat would occur.	acres of orchards) in the Cristianitos sub-basin; therefore the large majority of raptor breeding and foraging habitat in this sub-basin would be protected.
87. Protect the majority of the cactus wren locations within the sub-basin.	Consistent. A-5 would be consistent because 78% of cactus wren locations in the sub-basin would be protected.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore all cactus wren locations in the sub-basin would be protected.	Consistent. B-10M would be consistent because 87% of cactus wren locations in the sub-basin would be protected.	Consistent. B-12 would be consistent because it proposes limited development (25 acres for Ranch HQ and 50 acres of orchards) in the Cristianitos sub-basin, and therefore all cactus wren locations in the sub-basin would be protected.
88. Maintain a north-south habitat linkage along Cristianitos Creek between San Juan Creek and lower San Mateo Creek for dispersal and movement of gnatcatchers and other avian species, as well as large mammals such as mountain lion, bobcat, coyote, and mule deer, and, in particular, avoid occupied coastal sage scrub habitat in upper Cristianitos Canyon.	Not Consistent. A-5 would not be consistent because the development pattern would be such that extensive habitat fragmentation would occur and most likely would affect wildlife movement and gnatcatcher dispersal through the area.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore linkage N would be protected.	Consistent. B-10M would be consistent because linkage N would be protected through the flexibility of the golf course design including a setback from the creek and the low intensity of development proposed in the sub-basin.	Consistent. B-12 would be consistent because it proposes limited development (25 acres for relocation of Ranch HQ and 50 acres of orchards) within the Cristianitos sub-basin, and therefore linkage N would be protected.
89. Maintain an east-west habitat linkage from Gabino Creek to the confluence with Cristianitos Creek for wildlife movement between Gabino Canyon and the Donna O'Neill Conservancy at Rancho Mission Viejo.	Consistent. A-5 would be consistent because it would provide adequate open space to protect wildlife movement along Gabino Creek (linkage O), at the Gabino/Cristianitos confluence, and to the O'Neill Conservancy.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore wildlife movement along Gabino Creek (linkage O), at the Gabino/Cristianitos confluence, and to the O'Neill Conservancy would be protected.	Consistent. B-10M would be consistent because linkage O, along Gabino Creek, at the Gabino/Cristianitos Creek confluence and the O'Neill Conservancy would be protected.	Consistent. B-12 would be consistent because it proposes limited development (25 acres for Ranch HQ and 50 acres of orchards) in the Cristianitos sub-basin, and therefore would protect adequate open space for wildlife movement along Gabino Creek (linkage O), at the Gabino/Cristianitos confluence, and to the O'Neill Conservancy.
90. Protect the three locations supporting approximately 6,100 flowering stalks of thread-leaved brodiaea on the hill outcrop adjacent to the clay mine pits in the southern portion of Cristianitos	Consistent. A-5 would be consistent because it would avoid the three locations of brodiaea comprising the major population.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore the	Consistent. B-10M would be consistent because it would protect the three brodiaea locations comprising the <i>major population</i> .	Consistent. B-12 would be consistent because the limited development (25 acres for Ranch HQ and 50 acres of orchards) in the Cristianitos sub-basin would

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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
Canyon.		three brodiaea locations would be protected.		avoid the three brodiaea locations comprising the major population.
91. Protect 10 of the 13 small, scattered locations of thread-leaved brodiaea in Cristianitos Canyon, totaling approximately 285 flowering stalks, to achieve the objective of protecting important populations in key locations. Maintain a continuous habitat connection between these scattered populations to allow for interactions and genetic exchange between the populations. These locations provide a linkage between other brodiaea locations in the area and the area has good potential for enhancement and restoration.	Consistent. A-5 would be consistent because all scattered locations of brodiaea would be avoided.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore all scattered locations of brodiaea would be protected.	Could be Consistent. B-10M could be consistent because it would avoid nine of the 13 scattered locations. A tenth location of 120 flowering stalks could be avoided through design course design.	Could be Consistent. B-12 could be consistent because without additional avoidance 7 of 13 locations would be conserved. The limited development (25 acres for Ranch HQ and 50 acres of orchards) in the Cristianitos sub-basin potentially could be sited to avoid an additional three locations of the scattered brodiaea.
92. Protect the major population of many-stemmed dudleya extending from the southern portion of the Trampas Canyon subunit in the north, through the Cristianitos Canyon sub-basin south to the Talega development open space located in the San Clemente Watershed. This area supports the largest major population in the subregion with approximately 19,300 individuals in about 69 discrete locations.	Consistent. A-5 would be consistent because it would protect approximately 90% of discrete locations and 85% of individuals of many-stemmed dudleya in the Cristianitos sub-basin portion of the major population.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore all locations of many-stemmed dudleya would be protected.	Consistent: B-10M would be consistent because it would protect at least 90% of discrete locations and 88% of individuals of many-stemmed dudleya.	Consistent. B-12 would be consistent because it proposes limited development (25 acres for Ranch HQ and 50 acres of orchards) in the Cristianitos sub-basin. The overstated impacts would result in conservation of 84% of locations and 75% of individuals. With additional avoidance of the population, conservation levels would be much higher.
93. Protect the two known important populations of Coulter's saltbush in the sub-basin.	Consistent. A-5 would be consistent because it avoids the two populations of saltbush.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore the two locations of Coulter's saltbush would be protected.	Consistent. B-10M would be consistent because it avoids the two populations of saltbush.	Could be Consistent. B-12 could be consistent because it proposes limited development (25 acres for Ranch HQ and 50 acres of orchards) in the Cristianitos sub-basin which could be sited to avoid the two populations of Coulter's saltbush in the sub-basin.

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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
<i>Cristianitos Canyon Sub-basin Management Recommendations</i>				
94. Pursuant to a Grazing Management Plan, implement grazing management that identifies a rotational grazing pattern and a dry residue standard.	Not Consistent. A-5 would not be consistent because the proposed development pattern in the sub-basin likely would likely preclude a successful cattle ranch operation. Furthermore, A-5 proposes no Grazing Management Program.	Consistent. B-8 would be consistent because it proposes implementation of a Grazing Management Plan.	Consistent. B-10M would be consistent because it proposes implementation of a Grazing Management Plan.	Consistent. B-12 would be consistent because it proposes implementation of a Grazing Management Plan.
95. Implement a management program for protected sensitive plant locations in the sub-basin, including control of non-native invasive species, management of grazing as part of the Adaptive Management Program, and prevention of human disturbance.	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program.	Could be Consistent. B-8 could be consistent if additional funding to implement the Adaptive Management Program, including an Invasive Species Control Plan was identified.	Consistent. B-10M would be consistent because it proposes implementation of an Adaptive Management Program which includes an Invasive Species Control Plan. B-10M also proposes implementation of a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 11.	Consistent. B-12 would be consistent because it proposes implementation of an Adaptive Management Program which includes an Invasive Species Control Plan. B-12 also proposes implementation of a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 11.
<i>Cristianitos Canyon Sub-basin Restoration Recommendations</i>				
96. Implement a native grasslands restoration program for the upper portion of the sub-basin.	Not Consistent. A-5 would not be consistent because the proposed development pattern under A-5 would conflict with two of the areas identified for VGL restoration/enhancement and no Adaptive Management Program is proposed under this alternative.	Could be Consistent. B-8 could be consistent if additional funding to implement the Adaptive Management Program, including a Habitat Restoration Plan, was identified.	Not Consistent. B-10M would not be consistent because the proposed development pattern under B-10M would conflict with two of the areas identified for VGL restoration/enhancement.	Could be Consistent. B-12 could be consistent depending on the siting of the 50 acres of orchards within the Cristianitos sub-basin and avoidance of the areas proposed for VGL restoration/enhancement.
97. Translocate salvaged thread-leaved brodiaea and many-stemmed dudleya to CSS/VGL restoration and enhancement areas where feasible and appropriate. Potential restoration and enhancement areas in the sub-basin include upper Cristianitos Canyon and the southern portion of the Trampas Canyon subunit. Receiver areas should support clay	Not Consistent. A-5 would not be consistent because the proposed development pattern under A-5 would conflict with two of the areas identified for VGL restoration/enhancement	Could be Consistent. B-8 could be consistent because although it proposes no development in the Cristianitos sub-basin, and thus salvage of brodiaea and dudleya would not occur from the sub-basin, salvaged brodiaea and dudleya from elsewhere in the planning area could be translocated to	Not Consistent. B-10M would not be consistent because the development pattern in the Cristianitos sub-basin would conflict with two of the areas proposed for VGL restoration/enhancement.	Could be Consistent. B-12 could be consistent depending on the siting of the 50-acres of orchards within the Cristianitos sub-basin and avoidance of the areas proposed for VGL restoration/enhancement.

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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
soils suitable for brodiaea and dudleya, and should be placed in locations that maximize connectivity and genetic exchange.		restoration areas in upper Cristianitos and the southern portion of the Trampas Canyon subunit under the Translocation, Propagation and Management Plan for Special-status Plant Species component of the Adaptive Management Program. For B-8 to be consistent, however, additional funding to implement the salvage and translocation plan would have to be identified.		
98. Salvage clay topsoils from development areas where feasible and appropriate and transport to restoration areas. Salvaged topsoils may be used to create additional suitable brodiaea and dudleya habitat and may contain seedbank.	Not Consistent. A-5 would not be consistent because the proposed development pattern under A-5 would conflict with two of the areas identified for CSS/VGL restoration that could accommodate salvaged topsoils.	Could be Consistent. B-8 could be consistent because although it proposes no development in the Cristianitos sub-basin, salvaged topsoils from elsewhere in the planning area could be translocated to restoration areas in upper Cristianitos and the southern portion of the Trampas Canyon subunit under the Translocation, Propagation and Management Plan for Special-status Plant Species component of the Adaptive Management Program. For B-8 to be consistent, however, additional funding to implement the salvage and transport of soils would have to be identified.	Not Consistent. B-10M would not be consistent because the development pattern in the Cristianitos sub-basin would allow for the salvage and translocation of brodiaea and dudleya in the sub-basin to only a portion of the recommended locations.	Could be Consistent. B-12 could be consistent depending on the siting of the 50-acres of orchards within the Cristianitos sub-basin and avoidance of the areas proposed for VGL restoration/enhancement.
101. Protect the upper watershed headwaters, address erosion from the clay pits and implement creek stabilization actions to address localized erosion presently causing increases in fine sediment yields in	Not Consistent. A-5 would not be consistent because it proposes development in the headwaters areas, although not in the headwaters themselves. A-5 proposes no Adaptive Management	Could be Consistent. B-8 could be consistent because it proposes no development within RMV portion of the San Mateo Creek Watershed and is therefore consistent with this	Consistent. B-10M would be consistent because of implementation of golf course land uses to stabilize erosion from the clay pits. B-10M would also implement creek stabilization actions	Consistent. B-12 would be consistent because implementation of the Adaptive Management Program, including the Habitat Restoration Plan component, could address erosion from the clay pits

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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
Upper Cristianitos Creek per the "Watershed and Sub-Basin Planning Principles."	Program to address erosion or creek stabilization.	portion of the recommendation. However, to be consistent, funding to implement the Adaptive Management Program, which includes a Habitat Restoration Plan component, would have to be identified.	to address localized erosion through implementation of the Adaptive Management Program.	and implement creek stabilization actions to address localized erosion.
GABINO AND BLIND CANYONS SUB-BASINS				
<i>Upper Gabino Subunit Protection Recommendations</i>				
102. Protect a habitat linkage along Upper Gabino to allow dispersal of large mammals.	Not Consistent. A-5 would not be consistent because it would allow for substantial development within the Upper Gabino subunit, thus potentially affecting wildlife movement.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore linkages O and M would be protected.	Consistent. B-10M would be consistent because it proposes only 10 estate lots within western portion of the Upper Gabino subunit. The estates would be a minimum of approximately 1,000 feet from Gabino Creek and therefore linkages O and M would be protected.	Consistent. B-12 would be consistent because it proposes no development within the upper Gabino subunit and therefore linkages O and M would be protected.
103. Maintain contiguity and connectivity of coastal sage scrub to provide dispersal habitat for the cactus wren and other sensitive coastal sage scrub species.	Not Consistent. A-5 would not be consistent because the proposed development pattern for the Upper Gabino subunit is such that coastal sage scrub would be impacted, thus affecting dispersal habitat for cactus wren and other sensitive coastal sage scrub species.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore contiguity of coastal sage scrub would be protected.	Consistent. B-10M would be consistent because it proposes only 10 estate lots within the western portion of the Upper Gabino subunit, and would maintain the contiguity of coastal sage scrub.	Consistent. B-12 would be consistent because it proposes no development within the Upper Gabino subunit, and therefore contiguity of coastal sage scrub would be protected.
104. Minimize, to the extent feasible, impacts to grassland foraging habitat for resident and wintering raptors, as well as "live-in" habitat for several other wildlife species that potentially occur in the subunit, including grasshopper sparrow, wintering burrowing owls, badger, spadefoot toad and horned lark.	Not Consistent. A-5 would not be consistent because the proposed development pattern for the Upper Gabino subunit is such that grasslands would be impacted, thus affecting the grassland foraging habitat of raptors and "live in" habitat of other grassland species.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore grassland habitat in the subunit would be protected.	Consistent. B-10M would be consistent because it proposes only 10 estate lots within the western portion of the Upper Gabino subunit, and therefore the large majority of grassland habitat in the subunit would be protected.	Consistent. B-12 would be consistent because it proposes no development within the Upper Gabino subunit, and therefore grassland habitat in the subunit would be protected.
105. Protect Jerome Lake and surrounding uplands to maintain nesting habitat for the southwestern pond turtle.	Not Consistent. A-5 would not be consistent because while Jerome's Lake would be avoided, the adjacent surrounding uplands would be impacted.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore	Consistent. B-10M would be consistent because it proposes only 10 estate lots within the western portion of the Upper Gabino subunit, the closest of which to Jerome's	Consistent. B-12 would be consistent because it proposes no development within the Upper Gabino subunit, and therefore Jerome's Lake and surrounding

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DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
		Jerome's Lake and surrounding uplands would be protected.	Lake is more than 2,000 ft. Therefore Jerome's Lake and surrounding uplands would be protected.	uplands would be protected.
106. Protect the majority of native grasslands within the subunit. Manage and restore protected native grasslands in accordance with the management and restoration recommendations described below, including grazing management techniques.	Not Consistent. A-5 would not be consistent because the proposed development pattern is such that development occurs primarily in grasslands. Furthermore, A-5 proposes no Adaptive Management Program, including a Habitat Restoration Component.	Could be Consistent. B-8 could be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore existing grassland habitat in the sub-basin would be protected. For B-8 to be consistent, however, funding to implement the Adaptive Management Program, including the Habitat Restoration Plan would have to be identified.	Consistent. B-10M would be consistent because it proposes only 10 estate lots within the western portion of the Upper Gabino subunit, and therefore grassland habitat in the sub-basin would be protected. B-10M also proposes implementation of the Adaptive Management Program including the Habitat Restoration Plan that could restore protected native grasslands.	Consistent. B-12 would be consistent because it proposes no development within the Upper Gabino subunit, and therefore grassland habitat in the sub-basin would be protected. B-12 also proposes implementation of the Adaptive Management Program including the Habitat Restoration Plan that could restore protected native grasslands.
107. Protect the approximately six known discrete locations of many-stemmed dudleya in the subunit that are part of the major population in a key location. (Note that 2 of the locations mapped as part of the major population are in the Middle Gabino Canyon subunit but are included in this analysis.)	Consistent. A-5 would be consistent because it proposes only limited development within the western portion of the Upper Gabino subunit. There would be no impacts to many-stemmed dudleya in the subunit.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore all 6 locations of dudleya in the subunit would be protected.	Consistent. B-10M would be consistent because it proposes only 10 estate lots within the western portion of the Upper Gabino subunit. There would be no impacts to many-stemmed dudleya in the subunit.	Consistent. B-12 would be consistent because it proposes no development in the Upper Gabino subunit, and therefore all 6 locations of dudleya in the subunit would be protected.
108. Protect the important population of Coulter's saltbush in the subunit.	Consistent. A-5 would be consistent because it would avoid the important population of Coulter's saltbush in the subunit.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore Coulter's saltbush in the subunit would be protected.	Consistent. B-10M would be consistent because it proposes only 10 estate lots within the western portion of the Upper Gabino subunit. There would be no impacts to Coulter's saltbush in the subunit.	Consistent. B-12 would be consistent because it proposes no development within the Upper Gabino subunit, and therefore Coulter's saltbush in the subunit would be protected.
Upper Gabino Subunit Restoration Recommendations				
109. Implement a CSS/VGL restoration and enhancement program.	Not Consistent. A-5 would not be consistent because the proposed development pattern would not allow implementation of a CSS/VGL restoration program and	Could be Consistent. B-8 could be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it proposes only 10 estate lots within the western portion of the Upper Gabino subunit and identified restoration areas would	Consistent. B-12 would be consistent because it proposes no development in the Gabino Canyon sub-basin. B-12 also proposes an Adaptive

TABLE 8-1
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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
	enhancement in the Upper Gabino subunit. In addition A-5 does not propose an Adaptive Management Program.	However, for B-8 to be consistent funding to implement the CSS/VGL restoration components of the Adaptive Management Program would have to be identified.	not be impacted. B-10M also proposes an Adaptive Management Program including a Habitat Restoration Plan.	Management Program including a Habitat Restoration Plan.
110. Translocate any impacted many-stemmed dudleya to CSS/VGL restoration and enhancement areas in Upper Gabino where feasible and appropriate. Receiver areas should support clay soils suitable for dudleya.	Not Consistent. A-5 would not be consistent because the proposed development pattern would not allow implementation of a CSS/VGL restoration program and enhancement in the Upper Gabino subunit. In addition A-5 does not propose an Adaptive Management Program.	Could be Consistent. B-8 could be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed. However, for B-8 to be consistent funding to implement the CSS/VGL restoration and the Grazing Management Plan components of the Adaptive Management Program would have to be identified.	Consistent. B-10M would be consistent because there would be only 10 estate lots within the western portion of the Upper Gabino subunit. There would be no impact to the identified CSS/VGL restoration areas that could be receiver sites for dudleya translocations from other parts of the planning area under the Translocation, Propagation and Management Plan for Special-status Plant Species component of the Adaptive Management Program.	Consistent. B-12 would be consistent because there would be no development in the Gabino sub-basin and the proposed CSS/VGL restoration areas in the Upper Gabino subunit could be a receiver sites for dudleya translocations from other parts of the planning area under the Translocation, Propagation and Management Plan for Special-status Plant Species component of the Adaptive Management Program.
111. Salvage clay topsoils from development areas where feasible and transport to restoration areas. Salvaged topsoils may be used to create additional suitable dudleya habitat and may contain seedbank.	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program, including a Habitat Restoration Plan component.	Could be Consistent. B-8 could be consistent because although there would be no development in the RMV portion of the San Mateo Creek Watershed, the Upper Gabino subunit could be a receiver site for clay topsoil transport from other parts of the planning area under the Translocation, Propagation and Management Plan for Special-status Plant Species component of the Adaptive Management Program. For B-8 to be consistent, however, funding to implement the CSS/VGL restoration component of the Adaptive	Consistent. B-10M would be consistent because there would be only 10 estate lots within the western portion of Upper Gabino subunit, and thus could be a receiver site for clay topsoils from other parts of the planning area under the Translocation, Propagation and Management Plan for Special-status Plant Species component of the Adaptive Management Program.	Consistent. B-12 would be consistent because no development is proposed in the Gabino sub-basin and the Upper Gabino subunit could be a receiver site for clay topsoils from other parts of the planning area under the Translocation, Propagation and Management Plan for Special-status Plant Species component of the Adaptive Management Program.

TABLE 8-1
DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
		Management Program would have to be identified.		
112. Implement a creek restoration program in the subunit to address erosion that is generating increases in fine sediment yields in Upper Gabino.	Not Consistent. A-5 would not be consistent because it does not propose an Adaptive Management Program, including restoration of Gabino Creek.	Could be Consistent. B-8 could be consistent if funding to implement the Habitat Restoration Plan component of the Adaptive Management Program was identified.	Consistent. B-10M would be consistent because there would be only 10 estate lots within the western portion of the Upper Gabino subunit. Through implementation of the Habitat Restoration Plan component of the Adaptive Management Program, fine sediment yields would be decreased.	Consistent. B-12 would be consistent because through implementation of the Habitat Restoration Plan component of the Adaptive Management Program, fine sediment yields would be decreased.
<i>Middle Gabino Subunit Protection Recommendations</i>				
113. Limit impacts to ridgelines to the extent feasible in order to protect coarse sediments.	Not Consistent. A-5 would not be consistent because it proposes substantial development on ridgelines in the Middle Gabino subunit.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it proposes no development within the middle Gabino Canyon sub-basin.	Consistent. B-12 would be consistent because it proposes no development within the middle Gabino Canyon sub-basin.
114. Protect a north-south habitat linkage through Middle Gabino, with particular focus on maintaining uninterrupted riparian woodland through Middle Gabino and along the western tributary into Middle Gabino.	Not Consistent. A-5 would not be consistent because it proposes substantial development on ridgelines in the Middle Gabino subunit.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it proposes no development within the middle Gabino Canyon subunit.	Consistent. B-12 would be consistent because it proposes no development within the Gabino Canyon sub-basin.
115. Protect the arroyo toad population upstream from the confluence with La Paz Creek by avoiding impacts to breeding, foraging and estivation habitat and protect canyons to avoid downstream impacts to the toad.	Consistent. A-5 would be consistent because upstream of La Paz Creek in Middle Gabino, toad breeding habitat would be protected by avoidance of the creek. Canyons in middle Gabino would be protected through avoidance of regulated waters however, upland habitats would not.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it proposes no development within the middle Gabino Canyon subunit.	Consistent. B-12 would be consistent because it proposes no development within the Gabino Canyon sub-basin.
116. Protect the diversity of raptor nesting habitat with particular focus on retaining documented nesting habitat for white-tailed kites and	Not Consistent. A-5 would not be consistent because while it would avoid direct impacts to riparian habitats in Middle Gabino supporting	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek	Consistent. B-10M would be consistent because it proposes no development within the middle Gabino Canyon subunit.	Consistent. B-12 would be consistent because it proposes no development within the Gabino sub-basin.

TABLE 8-1
DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
long-eared owls within the subunit.	nesting raptors, indirect effects from adjacent development may adversely affect nesting by raptors, and in particular, the white-tailed kite and long-eared owl.	Watershed.		
117. Protect the four known discrete locations of many-stemmed dudleya in the subunit that are part of a major population in a key location.	Consistent. A-5 would be consistent because it would avoid the populations in the Middle Gabino Canyon subunit.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek.	Consistent. B-10M would be consistent because it proposes no development within the middle Gabino Canyon subunit.	Consistent. B-12 would be consistent because it proposes no development within the Gabino sub-basin.
<i>Middle Gabino Subunit Management Recommendations</i>				
118. Implement a management program for protected sensitive plant locations in the sub-basin, including control of non-native invasive species, management of grazing, and prevention of human disturbance.	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program.	Could be Consistent. B-8 could be consistent with this recommendation. However, for B-8 to be consistent, funding to implement the Adaptive Management Program, including an Invasive Species Control Plan and Grazing Management Plan, would have to be identified.	Consistent. B-10M would be consistent because it proposes implementation of an Adaptive Management Program which includes an Invasive Species Control Plan. B-10M would implement a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 11.	Consistent. B-12 would be consistent because it proposes implementation of an Adaptive Management Program which includes an Invasive Species Control Plan. B-12 would implement a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 11.
119. Pursuant to the Grazing Management Plan, implement grazing management techniques that provide for long-term protection of selected species within designated reserve areas.	Not Consistent. A-5 would not be consistent because it proposes no Grazing Management Program.	Consistent. B-8 would be consistent because it proposes implementation of a Grazing Management Plan.	Consistent. B-10M would be consistent because it proposes implementation of a Grazing Management Plan.	Consistent. B-12 would be consistent because it proposes implementation of a Grazing Management Plan.
120. Implement a management program for protected raptor nesting habitat in the sub-basin, including the minimization of human disturbance during the breeding season.	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program.	Could be Consistent. B-8 could be consistent with this recommendation. However, for B-8 to be consistent, funding to implement the Adaptive Management Program would have to be identified. In addition, it is likely that access policies will be implemented to control human disturbances, as described in Chapter 11.	Consistent. B-10M would be consistent because it proposes implementation of an Adaptive Management Program. In addition, access policies will be implemented to control human disturbances, as described in Chapter 11.	Consistent. B-12 would be consistent because it proposes implementation of an Adaptive Management Program. In addition, access policies will be implemented to control human disturbances, as described in Chapter 11.

TABLE 8-1
DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
Lower Gabino Subunit Including Blind Canyon Subunit Protection Recommendations				
121. Protect breeding and foraging habitat and movement opportunities within the streamcourse and adjacent alluvial terraces for the arroyo toad. Address potential upland estivation habitat needs in the context of best scientific information regarding the influence of topography, soils and other factors that appear to influence arroyo toad lateral movement and frequency of use in upland areas away from streamcourse habitat areas.	Not Consistent. A-5 would not be consistent because although it would avoid direct impacts to Gabino Creek and adjacent alluvial terraces that fall within USACE/CDFG jurisdiction, potential upland estivation habitat in Lower Gabino and Blind canyons outside USACE/CDFG jurisdiction is proposed for development.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it would avoid direct impacts to Gabino Creek and provide for setbacks from the creek to provide adequate adjacent alluvial terraces to support arroyo toad estivation. Development in the Blind Canyon portion of the sub-basin would be limited to the area below the ridgeline separating Gabino and Blind canyons.	Consistent. B-12 would be consistent because it would incorporate results of 5 years of planned toad telemetry studies into the design of the 500 acres of development to be located in Planning Area 8 to minimize impacts to the arroyo toad as specified in proposed SAMP EIS Special Condition I.D.8.
122. Protect riparian habitat for nesting yellow-breasted chat within the subunit.	Consistent. A-5 would be consistent because jurisdictional riparian habitat in Lower Gabino and Blind canyons would be protected under A-5.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it would avoid impacts to riparian nesting habitat for the chat in the Lower Gabino Canyon subunit and the Blind Canyon portion supports limited chat habitat.	Consistent. B-12 would be consistent because it would avoid impacts to riparian nesting habitat for the chat in the Lower Gabino Canyon subunit and the Blind Canyon portion supports limited chat habitat.
123. Minimize impacts to California gnatcatcher locations.	Not Consistent. A-5 would not be consistent because although it would avoid direct impacts to gnatcatcher locations in the subunit. However development is proposed for habitat surrounding the locations, potentially causing fragmentation and loss of habitat value.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent as it would avoid all 5 gnatcatcher locations in the subunit.	Could be Consistent. B-12 could be consistent depending on the final design of the 500 acres of development allowed within Planning Area 8.
124. Minimize impacts to cactus wren locations.	Not Consistent. A-5 would not be consistent because proposed development would impact 39% of the cactus wren locations.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Not Consistent. B-10M would not be consistent because proposed development in the Blind Canyon sub-unit would impact 83% of the cactus wren locations.	Could be Consistent. B-12 could be consistent depending on the final design of the 500 acres of development allowed within Planning Area 8.
125. Minimize impacts to native grasslands within the subunit	Not Consistent. A-5 would not be consistent because it would impact 46% of native grassland habitat in favor of avoiding impacts to	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek	Not Consistent. B-10M would not be consistent because it would not minimize impacts to grasslands within the lower Gabino/Blind	Could be Consistent. B-12 could be consistent because it proposes a limited development footprint of 500 acres within Planning Area 8,

TABLE 8-1
DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
	USACE/CDFG jurisdiction.	Watershed.	subunit.	thus impacts to grasslands in the lower Gabino/Blind subunit likely can be minimized.
126. Protect breeding habitat, and to the extent feasible, protect raptor foraging habitat for resident and wintering species.	Not Consistent. A-5 would not be consistent because although raptor breeding habitat associated with riparian habitat would be avoided under A-5, foraging areas, and particularly grasslands, are proposed for development.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Not Consistent. B-10M would not be consistent because although raptor breeding habitat in the Gabino Canyon portion of the subunit would be avoided, breeding habitat in the Blind Canyon portion and foraging areas, and particularly grasslands, are proposed for development.	Could be Consistent. B-12 could be consistent because it would avoid impacts to breeding habitat and proposes a limited development footprint of 500 acres within Planning Area 8 which could minimize impacts to suitable raptor foraging habitat in the lower Gabino/Blind subunit.
127. Maintain an east-west habitat linkage from Gabino Creek to the confluence with Cristianitos Creek for wildlife movement between Gabino Canyon and the Donna O'Neill Conservancy at Rancho Mission Viejo.	Consistent. A-5 would be consistent because it would avoid Gabino Creek to the confluence with Cristianitos Creek, maintaining an east-west habitat linkage to the Conservancy.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it would avoid Gabino Creek to the confluence with Cristianitos Creek, maintaining an east-west habitat linkage to the Conservancy.	Consistent. B-12 would be consistent because it would avoid Gabino Creek to the confluence with Cristianitos Creek, maintaining an east-west habitat linkage to the Conservancy.
128. Protect approximately 80 percent of the discrete many-stemmed dudleya locations in Lower Gabino and Blind Canyons such that the integrity of the major population in this area (<i>i.e.</i> , the combined Cristianitos and Gabino and Blind Canyons) is preserved.	Consistent. A-5 would be consistent because it would protect 93% of locations and 92% of individuals.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because approximately 82% of locations would be protected.	Could be Consistent. B-12 could be consistent because many-stemmed dudleya in Lower Gabino and Blind Canyons could be avoided in the final design of the 500 acres of development in Planning Area 8.
130. Protect the major population of brodiaea in a key location bordering the Lower Gabino Canyon sub-unit and Cristianitos Canyon sub-basin supporting approximately 6,100 flowering stalks of thread-leaved brodiaea in three locations on the hill outcrop adjacent to and east of the clay mine pits in the southern portion of Cristianitos Canyon and in the	Consistent. A-5 would be consistent because it would avoid all brodiaea locations.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed, and therefore the three brodiaea locations would be protected.	Consistent. B-10M would be consistent because proposed development would avoid the three locations of thread-leaved brodiaea.	Consistent. B-12 would be consistent because proposed development would avoid the three locations of thread-leaved brodiaea.

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DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
western portion of the Gabino subunit.				
131. Implement a management program for protected sensitive plant locations in the sub-basin, including control of non-native invasive species, management of grazing and minimization of human access and disturbance as part of the Adaptive Management Program.	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program.	Could be Consistent. B-8 could be consistent if funding to implement the Adaptive Management Program, including an Invasive Species Control Plan was identified. In addition, access policies will be implemented to control human disturbances, as described in Chapter 11.	Consistent. B-10M would be consistent because it proposes implementation of an Adaptive Management Program which includes an Invasive Species Control Plan. B-10M would implement a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 11.	Consistent. B-12 would be consistent because it proposes implementation of an Adaptive Management Program which includes an Invasive Species Control Plan. B-12 would implement a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 11.
132. Protect the integrity of the arroyo toad population in Lower Gabino and Cristianitos creeks, as well as San Mateo Creek, by maintaining hydrologic and sediment delivery processes, including maintaining the flow characteristics of episodic events in the sub-basin.	Consistent. A-5 could be consistent because it would avoid Lower Gabino Creek, and lower Cristianitos Creek, thereby protecting the toad population. Hydrologic and sediment delivery processes would be maintained by implementation of a Water Quality Management Plan per the OC DAMP.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it would avoid Lower Gabino Creek, and lower Cristianitos Creek, thereby protecting the toad population. Hydrologic and sediment delivery processes would be maintained by implementation of a Water Quality Management Plan.	Consistent. B-12 would be consistent because it would avoid Lower Gabino Creek, and lower Cristianitos Creek, thereby protecting the toad population. Hydrologic and sediment delivery processes would be maintained by implementation of a Water Quality Management Plan.
133. Implement an invasive plant species control effort in Cristianitos Creek between Gabino Creek and Talega Creek.	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program.	Could be Consistent. B-8 could be consistent if funding to implement the Adaptive Management Program, including an Invasive Species Control Plan to control tamarisk and pampas grass, was identified.	Consistent. B-10M would be consistent because it proposes an Invasive Species Control Plan component of the Adaptive Management Program which addresses species of concern in the sub-basin such as tamarisk and pampas grass.	Consistent. B-12 would be consistent because it proposes an Invasive Species Control Plan component of the Adaptive Management Program which addresses species of concern in the sub-basin such as tamarisk and pampas grass.
Lower Gabino Subunit including Blind Canyon Subunit Restoration Recommendations				
134. Implement a VGL restoration and enhancement program per the NCCP Guidelines.	Not Consistent. A-5 would not be consistent because the proposed development pattern would preclude full implementation of the restoration recommendations.	Could be Consistent. B-8 could be consistent if funding to implement the Adaptive Management Program, including the Habitat Restoration Plan was identified.	Not Consistent. B-10M would not be consistent because proposed development in the Blind Canyon portion of the subunit would preclude full implementation of the restoration recommendations.	Could be Consistent. B-12 could be consistent depending of the final design of the 500 acres of development allowed in Planning Area 8.

TABLE 8-1
DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
<i>La Paz Canyon Sub-basin Protection Recommendations</i>				
135. Maintain a habitat linkage along La Paz Canyon to convey movement and dispersal by mountain lion, bobcat, coyote and mule deer.	Consistent. A-5 would be consistent because it proposes no development in the La Paz sub-basin.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it proposes no development in the La Paz sub-basin.	Consistent. B-12 would be consistent because it proposes no development in the La Paz sub-basin.
136. Maintain contiguity and connectivity of coastal sage scrub to provide dispersal habitat for the cactus wren and other sensitive coastal sage scrub species.	Consistent. A-5 would be consistent because no development is proposed in the La Paz sub-basin.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it proposes no development in the La Paz sub-basin.	Consistent. B-12 would be consistent because it proposes no development in the La Paz sub-basin.
137. Maintain riparian habitat supporting nesting raptors.	Consistent. A-5 would be consistent because it proposes no development in the La Paz sub-basin.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it proposes no development in the La Paz sub-basin.	Consistent. B-12 would be consistent because it proposes no development in the La Paz sub-basin.
138. Protect alluvial fan scrub and hydrological conditions that support this plant community.	Consistent. A-5 would be consistent because it proposes no development in the La Paz sub-basin.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it proposes no development in the La Paz sub-basin.	Consistent. B-12 would be consistent because it proposes no development in the La Paz sub-basin.
139. Protect the locations of many-stemmed dudleya in the upper portion of the sub-basin.	Consistent. A-5 would be consistent because it proposes no development in the La Paz sub-basin.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it proposes no development in the La Paz sub-basin.	Consistent. B-12 would be consistent because it proposes no development in the La Paz sub-basin.
141. Protect the integrity of arroyo toad populations in Lower Gabino Creek, as well as downstream populations in Cristianitos and San Mateo creeks, by protecting the generation and transport of coarse sediments to downstream areas.	Consistent. A-5 would be consistent because it proposes no development in the La Paz sub-basin.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it proposes no development in the La Paz sub-basin.	Consistent. B-12 would be consistent because it proposes no development in the La Paz sub-basin.
<i>Talega Canyon Sub-basin Protection Recommendations</i>				
142. Protect the integrity of arroyo toad populations in Talega Canyon by maintaining current stormwater runoff patterns and hydrologic	Consistent. A-5 could be consistent because it would avoid Talega Creek, thereby protecting the toad population and hydrologic and	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek	Consistent. B-10M would be consistent because it would avoid Talega Creek, thereby protecting the toad population and hydrologic and	Consistent. B-12 would be consistent as it would avoid Talega Creek, thereby protecting the toad population and hydrologic and

TABLE 8-1
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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
conditions.	sediment delivery processes would be maintained by implementation of a Water Quality Management Plan per the OC DAMP.	Watershed.	sediment delivery processes would be maintained by implementation of a Water Quality Management Plan.	sediment delivery processes would be maintained by implementation of a Water Quality Management Plan.
143. Provide for comprehensive water quality treatment consistent with protection of arroyo toads in Talega Creek.	Could be Consistent. A-5 could be consistent because it would provide for comprehensive water quality treatment, through compliance with the County DAMP.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because water quality would be maintained by implementation of the Water Quality Management Plan.	Consistent. B-12 would be consistent because water quality would be maintained by implementation of the Water Quality Management Plan.
144. Protect breeding and foraging habitat and movement opportunities within the streamcourse and adjacent alluvial terraces for the arroyo toad. Address potential upland estivation habitat needs in the context of best scientific information regarding the influence of topography, soils and other factors that appear to influence arroyo toad lateral movement and frequency of use in upland areas away from streamcourse habitat areas.	Consistent. A-5 would be consistent because it would avoid direct impacts to Talega Creek and would include minimum setbacks of approximately 80 feet in elevation above the creek to provide for adequate upland habitat for lateral movement within adjacent alluvial terraces. Development would be concentrated on the clay soils that are less suitable habitat for the toad.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it would avoid direct impacts to Talega Creek and would include minimum setbacks of approximately 80 feet in elevation above the creek to provide for adequate upland habitat for lateral movement within adjacent alluvial terraces. Development would be concentrated on the clay soils that are less suitable habitat for the toad.	Consistent. B-12 would be consistent because it would avoid direct impacts to Talega Creek and would incorporate results of 5-years of planned toad telemetry studies into the final design of the 500 acres of development allowed in Planning Area 8 to minimize impacts to the arroyo toad as specified in proposed SAMP EIS Special Condition I.D.8.
145. Protect raptor nesting locations in the sub-basin, with particular attention to nesting of white-tailed kite and long-eared owl within the sub-basin. (Note that 1 long-eared owl and 3 white-tailed kite historic nest sites are located in Talega Creek just south of the RMV boundary.)	Consistent. A-5 would be consistent because although 1 long-eared owl and 3 white-tailed kite historic nesting locations, as well as other raptor nest sites, associated with Talega Creek riparian habitat would be protected. Setbacks of a minimum of 80 feet in elevation and steep topography between the creek and proposed development under A-5 would provide an adequate buffer.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because 1 long-eared owl and 3 white-tailed kite historic nesting locations, as well as other raptor nest sites, associated with Talega Creek riparian habitat would be protected under B-10M. Setbacks of a minimum of 80 feet in elevation and steep topography between the creek and proposed development under B-10M would provide an adequate buffer.	Consistent. B-12 would be consistent because 1 long-eared owl and 3 white-tailed kite historic nesting locations, as well as other raptor nest sites, associated with Talega Creek riparian habitat would be protected under B-12. Final siting of 500 acres of development in Planning Area 8 per proposed SAMP EIS Special Condition I.D.8 would minimize impacts to Talega Creek riparian habitat.
146. Maintain an east-west habitat linkage for gnatcatcher and cactus wren to protected habitat in the	Consistent. A-5 would be consistent because it would avoid habitat linkage Q along Talega	Consistent. B-8 would be consistent because it proposes no development within the RMV	Consistent. B-10M would be consistent because it would avoid habitat linkage Q along Talega	Consistent. B-12 would be consistent because it would avoid habitat linkage Q along Talega

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PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
Talega and Forster Ranch Planned Communities.	Canyon.	portion of the San Mateo Creek Watershed.	Canyon.	Canyon.
147. Maintain an east-west habitat linkage for large mammals along Talega Creek with sufficient width at confluence with Cristianitos Creek and along south-facing slope.	Consistent. A-5 would be consistent because it would avoid habitat linkage Q along Talega Canyon.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it would avoid habitat linkage Q along Talega Canyon.	Consistent. B-12 would be consistent because it would avoid habitat linkage Q along Talega Canyon.
148. Protect the four known locations of thread-leaved brodiaea east of the Northrop Grumman facilities that constitute an important population	Consistent. A-5 would be consistent because it would avoid impacts to the four brodiaea locations.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it would avoid impacts to the four brodiaea locations.	Could be Consistent. B-12 could be consistent depending of the final design of the 500 acres of development allowed in Planning Area 8.
149. Protect eight locations of many-stemmed dudleya east of the Northrop Grumman facilities that may constitute an important population.	Consistent. A-5 would be consistent because it would avoid impacts to the eight dudleya locations.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it would avoid impacts to the eight dudleya locations.	Consistent. B-12 would be consistent because it would avoid impacts to the eight dudleya locations.
Other Planning Area Protection Recommendations				
150. Protect a habitat linkage, consisting of the Donna O'Neill Land Conservancy and an area along the east side of Cristianitos Creek, to provide connectivity for gnatcatchers in the upper portion of the sub-basin with other populations in Lower Gabino Creek and Camp Pendleton along lower Cristianitos/San Mateo Creek, and to maintain habitat integrity through connectivity within the Donna O'Neill Land Conservancy at Rancho Mission Viejo.	Consistent. A-5 would be consistent because it would provide for a habitat linkage (N) along Cristianitos Creek and the O'Neill Conservancy by providing a setback from Cristianitos Creek for development in the Cristianitos and Talega sub-basins.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it would provide for a habitat linkage (N) along Cristianitos Creek and the O'Neill Conservancy by providing a setback from Cristianitos Creek for development in the Cristianitos and Talega sub-basins. In addition, construction of the golf course would include 60 ac of native habitat restoration that would enhance habitat connectivity.	Consistent. B-12 would be consistent because it would provide for a habitat linkage (N) along Cristianitos Creek and the O'Neill Conservancy.
151. Protect the majority of native grasslands in the area.	Not Consistent. A-5 would not be consistent because it would protect 35% of native grassland in the sub-basin.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it would protect 54% (6.6 acres) of native grassland in the sub-basin.	Could be Consistent. B-12 could be consistent depending of the final design of the 500 acres of development allowed in Planning Area 8.

TABLE 8-1
DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
152. Protect the integrity of arroyo toad populations in lower Cristianitos Creek by maintaining current hydrologic conditions.	Consistent. A-5 would be consistent because hydrologic and sediment delivery processes would be maintained by addressing "hydrologic conditions of concern" in compliance with the County of Orange DAMP/Local Water Quality Management Plan.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because hydrologic and sediment delivery processes would be maintained by addressing "hydrologic conditions of concern" in compliance with the Water Quality Management Plan.	Consistent. B-12 would be consistent because hydrologic and sediment delivery processes would be maintained by addressing "hydrologic conditions of concern" in compliance with the Water Quality Management Plan.
153. Protect breeding and foraging habitat and movement opportunities within the streamcourse and adjacent alluvial terraces for the arroyo toad. Address potential upland estivation habitat needs in the context of best scientific information regarding the influence of topography, soils and other factors that appear to influence arroyo toad lateral movement and frequency of use in upland areas away from streamcourse habitat areas.	Consistent. A-5 would be consistent because it would avoid direct impacts to Cristianitos Creek, adjacent alluvial terraces that fall within USACE/CDFG jurisdiction, and adjacent non-jurisdictional uplands adequate to allow for lateral movement.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it would avoid direct impacts to lower Cristianitos Creek and Talega Creek and would include setbacks at a minimum of 80 feet above the creek to provide for adequate upland habitat for lateral movement within adjacent alluvial terraces.	Consistent. B-12 would be consistent because it would avoid direct impacts to lower Cristianitos Creek and Talega Creek and would incorporate results of 5-years of planned toad telemetry studies into the final design of the 500 acres of development allowed in Planning Area 8 to minimize impacts to the arroyo toad as specified in proposed SAMP EIS Special Condition I.D.8.
154. Protect breeding and foraging habitat for the least Bell's vireo, yellow-breasted chat and yellow warbler along lower Cristianitos Creek.	Consistent. A-5 would be consistent because it would avoid impacts to lower Cristianitos Creek and adjacent uplands and thus protect breeding and foraging habitat for the least Bell's vireo, yellow-breasted chat and yellow warbler.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it would avoid impacts to lower Cristianitos Creek and adjacent uplands and thus protect breeding and foraging habitat for the least Bell's vireo, yellow-breasted chat and yellow warbler.	Consistent. B-12 would be consistent because it would avoid impacts to lower Cristianitos Creek and adjacent uplands and thus protect breeding and foraging habitat for the least Bell's vireo, yellow-breasted chat and yellow warbler.
155. Protect breeding habitat and to the extent feasible foraging habitat for resident and wintering raptor species.	Not Consistent. A-5 would be consistent because while it would avoid impacts to breeding habitat in lower Cristianitos Creek and adjacent upland foraging habitat would be impacted.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it would avoid impacts to lower Cristianitos Creek breeding habitat and most of the adjacent upland foraging habitat for the raptors.	Consistent. B-12 would be consistent because it would avoid impacts to lower Cristianitos Creek breeding habitat and most of the adjacent upland foraging habitat for the raptors.
156. Maintain a north-south habitat linkage along Cristianitos Creek between San Juan Creek and	Consistent. A-5 would be consistent because development would be setback from Cristianitos	Consistent. B-8 would be consistent because it proposes no development within the RMV	Consistent. B-10M would be consistent because development would be setback from Cristianitos	Consistent. B-12 would be consistent because a north-south habitat linkage would be

TABLE 8-1
DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
lower San Mateo Creek for gnatcatchers and other avian species, as well as large mammals such as mountain lion, bobcat, coyote, and mule deer.	Creek in this sub-basin, and in combination with the setback of development in the Talega sub-basin, the function of habitat linkage N would be maintained.	portion of the San Mateo Creek Watershed.	Creek in this sub-basin, and in combination with the setback of development in the Talega sub-basin, the function of habitat linkage N would be maintained.	maintained.
157. Maintain an east-west habitat linkage from Gabino Creek to the confluence with Cristianitos Creek for wildlife movement between Gabino Canyon and the Donna O'Neill Conservancy at Rancho Mission Viejo.	Consistent. A-5 would be consistent within this sub-basin because it proposes a setback between development and the confluence of Cristianitos and Gabino creeks, thus maintaining an east-west habitat linkage (O) to the Conservancy.	Consistent. B-8 would be consistent because it proposes no development within the RMV portion of the San Mateo Creek Watershed.	Consistent. B-10M would be consistent because it proposes a setback between development and the confluence of Cristianitos and Gabino creeks, thus maintaining an east-west habitat linkage (O) to the Conservancy.	Consistent. B-12 would be consistent because an east-west habitat linkage (O) to the Conservancy would be maintained.
Other Planning Area Management Recommendations				
158. In conjunction with upstream and adjacent control efforts, implement an invasive plant species control program.	Not Consistent. A-5 would not be consistent because it proposes no Adaptive Management Program.	Could be Consistent. B-8 could be consistent if funding to implement the Adaptive Management Program, including an Invasive Plant Species Control Plan, was identified.	Consistent. B-10M would be consistent because it would include an Invasive Plant Species Control Plan component of the Adaptive Management Program which addresses species of concern in the sub-basin such as tamarisk and pampas grass.	Consistent. B-12 would be consistent because it would include an Invasive Plant Species Control Plan component of the Adaptive Management Program which addresses species of concern in the sub-basin such as tamarisk and pampas grass.
PLANNING AREA-WIDE PROTECTION RECOMMENDATIONS				
Golden Eagle Protection Recommendations				
159. Protect foraging habitat for the golden eagle to the extent feasible in the Chiquita, Gobernadora, Upper Gabino, Cristianitos and Talega sub-basins. (Note: As described in the NCCP Planning Guidelines, "Golden eagles are an uncommon resident in the subregion. They are known to nest in the Cleveland National Forest, and although not known to nest on RMV, they occasionally forage in grasslands and agricultural areas throughout much	Not Consistent. A-5 would be consistent with this recommendation. Under A-5, potential golden eagle foraging habitat in the Chiquita, Gobernadora, Cristianitos and Talega sub-basins would be impacted. However, within the context of occasional use of RMV for foraging, the golden eagle likely would continue to forage in the planning area under the A-5 alternative in areas such as Upper Gabino Canyon and Upper Chiquita Canyon.	Consistent. B-8 would be consistent because it would concentrate development in the Gobernadora sub-basin, leaving the Chiquita, Cristianitos, Gabino and Blind Canyons, and Talega sub-basins intact and suitable as foraging habitat for the golden eagle.	Consistent. B-10M would be consistent with this recommendation. Under B-10M, potential golden eagle foraging habitat in the Chiquita, Gobernadora, Cristianitos and Talega sub-basins would be impacted. However, within the context of occasional use of RMV for foraging, the golden eagle likely would continue to forage in the planning area under the B-10M alternative in areas such as Upper Gabino Canyon and Upper Chiquita Canyon.	Consistent. B-12 would be consistent because while it proposes development in the Lower Chiquita, Gobernadora and limited development in the Talega and Cristianitos sub-basins, foraging habitat would be protected in Middle and Upper Chiquita, Upper Gabino, La Paz and the remaining portions of Talega and Cristianitos sub-basins. Within the context of occasional use of RMV for foraging, the golden eagle likely would continue to forage in the planning area under the B-12

TABLE 8-1
DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
of RMV, but especially in grasslands and agricultural areas in the Chiquita, Gobernadora, upper Gabino, Cristianitos, and Talega sub-basins.")				alternative.
Mountain Lion Protection Recommendations				
160. Protect "live-in" habitat within the RMV portion of the San Mateo Creek Watershed and Verdugo Canyon in the San Juan Creek Watershed adequate to meet the life history requirements of the mountain lion, comprising a large, unfragmented block of chaparral and coastal sage scrub directly connected to more than 100,000 acres in Caspers Wilderness Park, the Cleveland National Forest, and Camp Pendleton.	Consistent. A-5 would be consistent because it would provide for a large habitat block consisting of Verdugo Canyon, upper and Middle Gabino, and La Paz canyons, and the eastern Talega sub-basin, which would link to Caspers Wilderness Park, the CNF, and Camp Pendleton.	Consistent. B-8 would be consistent because it proposes no development in the San Mateo Creek Watershed or Verdugo Canyon. Therefore, a large "live-in" habitat block consisting of Gabino, Cristianitos, La Paz and Talega would be protected that would link to Caspers Wilderness Park, the CNF, and Camp Pendleton.	Consistent. B-10M would be consistent because it would provide for a large habitat block consisting of Verdugo Canyon, upper and Middle Gabino, and La Paz canyons, and the eastern Talega sub-basin, which would link to Caspers Wilderness Park, the CNF, and Camp Pendleton.	Consistent. B-12 would be consistent because it proposes no development in the Gabino and La Paz and very limited development in the Cristianitos sub-basins, as well limited development in the Talega sub-basin. A large "live-in" habitat block in the RMV portion of the San Mateo Creek Watershed would be protected. While B-12 proposes development within the Verdugo sub-basin, the upper portion of the sub-basin within RMV would be protected, thereby providing a link from Camp Pendleton through to Caspers Wilderness Park and the CNF.
161. Maintain habitat connections throughout the planning area to provide movement opportunities for the mountain lion. As described above for individual sub-basins, as well as other areas in the planning area, important movement areas for mountain lion include Arroyo Trabuco, the Foothill-Trabuco Specific Plan Area, Chiquita Ridge, Sulphur Canyon, San Juan Creek, Trampas Canyon, Cristianitos Canyon, Verdugo Canyon, Gabino Canyon, La Paz Canyon and Talega Canyon.	See individual sub-basins for consistency.	See individual sub-basins for consistency.	See individual sub-basins for consistency.	See individual sub-basins for consistency.

TABLE 8-1
DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
Mountain Lion Management Recommendations				
162. In areas identified as "live-in" habitat or habitat connections for mountain lion, roads that are necessary to serve approved land and water uses located inside or outside the permanent open space shall be designed and sited to accommodate mountain lion movement to the maximum extent feasible. Where roads are necessary, under the approved NCCP/HCP, they will be designed consistent with safety, roadway design criteria that are appropriate for the setting and desired roadway function. Roadway design shall include bridges and/or culverts large enough to accommodate mountain lion movement at key areas and, where appropriate and feasible, may include wildlife over crossings. As appropriate, fencing, grading and plant cover will be provided to serve wildlife crossings consistent with conservation principles and the Adaptive Management Program. Where feasible and safe, lighting along roadways within the permanent open space should be avoided. Where roadway lighting within the permanent open space is necessary for public safety reasons, it should be low-sodium or similar low intensity lighting that is directed away or shielded from the permanent open space.	Consistent. A-5 would be consistent because it would rely on the existing ranch roads for access.	Consistent. B-8 would be consistent because roads constructed as part of B-8 would comply with the recommendation regarding siting, wildlife movement bridges and culverts, and lighting. Bridges would have a 20-ft minimum height, culverts would be a minimum of 15x15 ft, 10-ft chain link fencing would be erected within 100 ft of bridge and culvert crossings, and necessary lighting would be shielded to prevent spill-over effects per GPA/ZC EIR mitigation measure 4.9-22.	Consistent. B-10M would be consistent because roads constructed as part of B-10M would comply with the recommendation regarding siting, wildlife movement bridges and culverts, and lighting. Bridges would have a 20-ft minimum height, culverts would be a minimum of 15x15 ft, 10-ft chain link fencing would be erected within 100 ft of bridge and culvert crossings, and necessary lighting would be shielded to prevent spill-over effects per GPA/ZC EIR mitigation measure 4.9-22.	Consistent. B-12 would be consistent because roads constructed as part of B-12 would comply with the recommendation regarding siting, wildlife movement bridges and culverts, and lighting. Bridges would have a 20-ft minimum height, culverts would be a minimum of 15x15 ft, 10-ft chain link fencing would be erected within 100 ft of bridge and culvert crossings, and necessary lighting would be shielded to prevent spill-over effects per GPA/ZC EIR mitigation measure 4.9-22.

TABLE 8-1
DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
Mule Deer Protection Recommendations				
163. Protect "live-in" habitat within the portion of the San Mateo Creek Watershed in the planning area adequate to meet the life history requirements of the mule deer, comprising a large, unfragmented block of chaparral and coastal sage scrub directly connected to Caspers Wilderness Park, the Cleveland National Forest, and Camp Pendleton.	Consistent. A-5 would be consistent because it would provide for a large habitat block consisting of the upper and Middle Gabino and La Paz sub-basin and the eastern Talega sub-basin which would link to Caspers Wilderness Park, the CNF, and Camp Pendleton.	Consistent. B-8 would be consistent because it proposes no development in RMV portion of the San Mateo Creek Watershed. Therefore, a large "live-in" habitat block consisting of the Gabino, Cristianitos, La Paz and Talega sub-basins would be protected that would link to Caspers Wilderness Park, the CNF, and Camp Pendleton.	Consistent. B-10M would be consistent because it would provide for a large habitat block consisting of the upper and Middle Gabino and La Paz sub-basin and the eastern Talega sub-basin which would link to Caspers Wilderness Park, the CNF, and Camp Pendleton.	Consistent. B-12 would be consistent because it proposes no development in the Gabino and La Paz and very limited development in the Cristianitos sub-basins, as well limited development in the Talega sub-basin. A large "live-in" habitat block in the RMV portion of the San Mateo Creek Watershed would be protected. While B-12 proposes development within the Verdugo sub-basin, the upper portion of the sub-basin within RMV would be protected, thereby providing a link from Camp Pendleton through to Caspers Wilderness Park and the CNF.
164. Protect "live-in" habitat within the San Juan Creek Watershed in the planning area adequate to meet the life history requirements of the mule deer, including Chiquita Ridge, Chiquadora Ridge, the ridgeline separating the Chiquita and Wagon Wheel sub-basins, and the ridgeline separating the Gobernadora and Bell Canyon sub-basins that directly connects to Caspers Wilderness Park and Audubon Starr Ranch Sanctuary.	See individual sub-basins for consistency.	See individual sub-basins for consistency.	See individual sub-basins for consistency.	See individual sub-basins for consistency.
165. Maintain habitat connections throughout the planning area to provide movement opportunities for the mule deer. As described above for individual sub-basins, as well as other areas in the planning area, important movement areas for mule deer include Arroyo Trabuco, the	Consistent. See individual sub-basins for specific consistency determinations for this recommendation. In addition, the Arroyo Trabuco would be protected under B-10M. Habitat connectivity in the Foothill-Trabuco Specific Plan area (Subarea 2) has been	Consistent. See individual sub-basins for specific consistency determinations for this recommendation. In addition, the Arroyo Trabuco would be protected under B-8. Habitat connectivity in the Foothill-Trabuco Specific Plan	Consistent. See individual sub-basins for specific consistency determinations for this recommendation. In addition, the Arroyo Trabuco would be protected under B-10M. Habitat connectivity in the Foothill-Trabuco Specific Plan area (Subarea 2) has been	Consistent. See individual sub-basins for specific consistency determinations for this recommendation. In addition, the Arroyo Trabuco would be protected under B-12. Habitat connectivity in the Foothill-Trabuco Specific Plan area (Subarea 2) has been

TABLE 8-1
DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
Foothill-Trabuco Specific Plan Area, Chiquita Ridge, Sulphur Canyon, San Juan Creek, Trampas Canyon, Cristianitos Canyon, Verdugo Canyon, Gabino Canyon, La Paz Canyon and Talega Canyon.	addressed in part through (1) the prior section 7 consultation for Saddleback Meadows and (2) the planned acquisition of Saddlecrest.	area (Subarea 2) has been addressed in part through (1) the prior section 7 consultation for Saddleback Meadows and (2) the planned acquisition of Saddlecrest.	addressed in part through (1) the prior section 7 consultation for Saddleback Meadows and (2) the planned acquisition of Saddlecrest.	addressed in part through (1) the prior section 7 consultation for Saddleback Meadows and (2) the planned acquisition of Saddlecrest.
<i>Mule Deer Management Recommendations</i>				
166. In areas identified as "live-in" habitat or habitat connections, roads that are necessary to serve approved land and water uses located inside or outside the permanent open space shall be designed and sited to accommodate mule deer movement to the maximum extent feasible. Where roads are necessary, under the approved NCCP/HCP, they will be designed consistent with safety, roadway design criteria that are appropriate for the setting and desired roadway function. Roadway design shall include bridges and/or culverts large enough to accommodate mule deer movement at key areas and, where appropriate and feasible, may include wildlife over crossings. (note: of the large mammal species, mule deer are the most sensitive to bridge and culvert design. Designs that accommodate mule deer are generally suitable for mountain lion, bobcat and coyote.) As appropriate, fencing, grading and plant cover will be provided to serve wildlife crossings consistent	Consistent. A-5 would not be consistent because it would rely on the existing ranch roads for access.	Consistent. B-8 would be consistent because roads constructed as part B-8 would comply with the regarding siting, wildlife movement bridges and culverts, and lighting. Bridges would have a 20-ft minimum height, culverts would be a minimum of 15x15 ft, 10-ft chain link fencing would be erected within 100 ft of bridge and culvert crossings, and necessary lighting would be shielded to prevent spill-over effects per GPA/ZC EIR mitigation measure 4.9-22.	Consistent. B-10M would be consistent because roads constructed as part B-10M would comply with the recommendation regarding siting, wildlife movement bridges and culverts, and lighting. Bridges would have a 20-ft minimum height, culverts would be a minimum of 15x15 ft, 10-ft chain link fencing would be erected within 100 ft of bridge and culvert crossings, and necessary lighting would be shielded to prevent spill-over effects per GPA/ZC EIR mitigation measure 4.9-22..	Consistent. B-12 would be consistent because roads constructed as part B-12 would comply with the recommendation regarding siting, wildlife movement bridges and culverts, and lighting. Bridges would have a 20-ft minimum height, culverts would be a minimum of 15x15 ft, 10-ft chain link fencing would be erected within 100 ft of bridge and culvert crossings, and necessary lighting would be shielded to prevent spill-over effects per GPA/ZC EIR mitigation measure 4.9-22..

TABLE 8-1
DRAFT SOUTHERN PLANNING GUIDELINES CONSISTENCY FINDINGS

PLANNING GUIDELINES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
with conservation principles and the Adaptive Management Program. Where feasible and safe, lighting along roadways within the permanent open space should be avoided. Where roadway lighting within the permanent open space is necessary for public safety reasons, it should be low-sodium or similar low intensity lighting that is directed away or shielded from the permanent open space.				

TABLE 8-2
SAMP WATERSHED AND SUB-BASIN PLANNING PRINCIPLES CONSISTENCY FINDINGS

PLANNING PRINCIPLES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
SAN JUAN CREEK WATERSHED				
<i>Chiquita Canyon Sub-basin</i>				
1. Consistent with the SAMP Tenets, protect the headwaters of Upper Chiquita Canyon.	Consistent. A-5 would be consistent because Upper Chiquita Canyon north of Oso Parkway was conserved as mitigation for the FTC-N segment between Oso Parkway and Antonio Parkway.	Consistent. B-8 would be consistent because Upper Chiquita Canyon north of Oso Parkway was conserved as mitigation for the FTC-N segment between Oso Parkway and Antonio Parkway.	Consistent. B-10M would be consistent because Upper Chiquita Canyon north of Oso Parkway was conserved as mitigation for the FTC-N segment between Oso Parkway and Antonio Parkway.	Consistent. B-12 would be consistent because Upper Chiquita Canyon north of Oso Parkway was conserved as mitigation for the FTC-N segment between Oso Parkway and Antonio Parkway.
2. Avoid creating impervious surfaces in the sandy soils of the canyon floor. To the extent feasible, land uses in the major side canyons should be limited to primarily pervious surfaces in order to maintain infiltration.	Not Consistent. A-5 would not be consistent because development would occur in the side canyons in Chiquita Canyon.	Consistent. B-8 would be consistent because it proposes no development within the Chiquita sub-basin north of San Juan Creek.	Consistent. B-10M would be consistent because it would avoid creating impervious surfaces in the valley floor throughout the sub-basin and in the major side canyons above the treatment plant. The major side canyon below the treatment plant would be impacted. Uses proposed in the valley floor and major side canyons above the treatment plant would be pervious including golf course and habitat protection.	Consistent. B-12 would be consistent because no development would occur in the sandy soils in the main canyon floor throughout the sub-basin and therefore no impervious surfaces would occur in this location. Limited development would occur north of the treatment plant and the majority of the side canyon above the treatment plant would be avoided. Development would occur below the treatment plant under this alternative, and the major side canyon would be impacted.
3. Emulate existing terrains/hydrology and sediment transport processes by locating development on the ridges, which under present conditions have higher runoff rates and direct surface runoff flows to the permeable substrate of the major side canyons and along the valley floor.	Not Consistent. A-5 would not be consistent because development would occur in the major side canyons.	Not Applicable. B-8 proposes no development within the Chiquita sub-basin north of San Juan Creek therefore existing terrains/hydrology and sediment transport processes would continue.	Consistent. B-10M would be consistent because it would locate development on the ridges thus emulating existing terrains and hydrology and implementation of the WQMP would emulate existing sediment transport processes.	Consistent. B-12 would be consistent because development south of the treatment plant is concentrated on the ridges thus emulating existing terrains and hydrology and implementation of the WQMP would emulate existing sediment transport processes.

TABLE 8-2
SAMP WATERSHED AND SUB-BASIN PLANNING PRINCIPLES CONSISTENCY FINDINGS

PLANNING PRINCIPLES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
4. Promote stormwater surface flow connectivity between the major side canyons and the main stream channel to maintain transient surface channel connections that occur following extreme rainfall events, without significantly changing connections during small storms.	Not Consistent. A-5 would not be consistent because development would impact the side canyons and the valley floor would disrupt surface flow connectivity between the major side canyons and the main stream channel.	Consistent. B-12 would be consistent because it proposes no development within the Chiquita sub-basin north of San Juan Creek.	Consistent. B-10M would be consistent through golf course uses and implementation of the WQMP which promotes stormwater connectivity between the majority of major side canyons and the main stem channel.	Consistent. B-12 would be consistent through implementation of the WQMP which promotes stormwater connectivity between the majority of major side canyons, particularly north of the treatment plant and below Tesoro High School, and the main stem channel.
5. Identify natural treatment systems for water quality treatment and stormwater detention that would be appropriate in the sandy soils of the major side canyons and the valley floor.	Could be Consistent. A-5 could be consistent by siting or providing low density development to allow for water quality treatment and stormwater detention in the sandy soils of the major side canyons and the valley floor.	Not Applicable. B-8 proposes no development within the Chiquita sub-basin north of San Juan Creek therefore no water quality treatment would be necessary.	Consistent. B-10M would be consistent because the Water Quality Management Plan identifies natural treatment systems and stormwater detention appropriate for the sandy soils in the major side canyons and the valley floor that would be implemented by this alternative.	Consistent. B-12 would be consistent because the Water Quality Management Plan identifies natural treatment systems and stormwater detention appropriate for the sandy soils in the major side canyons and the valley floor that would be implemented by this alternative.
6. Maintain groundwater recharge to the shallow subsurface water system to sustain flows to Chiquita Creek.	Could be Consistent. A-5 could be consistent by placing groundwater recharge systems in the side canyons and along the valley floor.	Consistent. B-8 would be consistent because it proposes no development within the Chiquita sub-basin north of San Juan Creek, and therefore existing groundwater recharge would be maintained in the sub-basin.	Consistent. B-10M would be consistent because stormwater flows would be directed to the major side canyons and detention areas along the valley floor as provided for in the Water Quality Management Plan. Groundwater recharge would be maintained to Chiquita Creek under this alternative.	Consistent. B-12 would be consistent because existing groundwater recharge would be maintained north of the treatment plant under this alternative. South of the treatment plant, groundwater recharge would be maintained via protection of the valley floor below the treatment plant and implementation of the Water Quality Management Plan. Groundwater recharge would be maintained to Chiquita Creek under this alternative.

TABLE 8-2
SAMP WATERSHED AND SUB-BASIN PLANNING PRINCIPLES CONSISTENCY FINDINGS

PLANNING PRINCIPLES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
7. Address existing areas of channel incision that result from primarily localized processes/land use practices, as contrasted with terrace-forming valley-deepening areas that are primarily a result of long-term geologic conditions. Site-by-site geomorphic analysis will be undertaken to define these areas.	Not Consistent. A-5 would not be consistent because it does not include an Adaptive Management Program and thus would not provide for addressing areas of existing channel incision.	Could be Consistent. B-8 could be consistent if an additional funding source is identified to implement the Adaptive Management Program, including the Habitat Restoration Plan component.	Consistent. B-10M would be consistent because it proposes implementation of an Adaptive Management Program which includes a Habitat Restoration Plan to address localized headcuts.	Consistent. B-12 would be consistent because it proposes implementation of an Adaptive Management Program which includes a Habitat Restoration Plan to address localized headcuts.
8. To the maximum extent practical, avoid direct impacts to the slope wetlands and maintain primary recharge characteristics that support these wetlands	Consistent. A-5 would be consistent because as a wetlands avoidance alternative, it would avoid direct impacts on slope wetlands. Deep subsurface recharge areas would not be affected by development under this Alternative.	Consistent. B-6 would be consistent because it proposes no development within the Chiquita sub-basin north of San Juan Creek.	Not Consistent. B-10M would not be consistent because it would impact slope wetlands north of the treatment plant and east of the creek. Slope wetlands south of the treatment plant and west of the creek would be protected. With regard to maintaining the primary recharge characteristics that support these wetlands, project grading will not intersect the primary groundwater movement formations. Given existing hardpan soils, future landscape irrigation and the protection of a significant portion of Chiquadora Ridge, recharge would be maintained into the deep groundwater system supporting the slope wetlands.	Consistent. B-12 would be consistent because it would avoid all but two of the slope wetlands in Chiquita Canyon. One small and the edge of a large slope wetland below the treatment plant would be impacted. With regard to maintaining the primary recharge characteristics that support these wetlands, project grading will not intersect the primary groundwater movement formations. Given existing hardpan soils, future landscape irrigation and the protection of a significant portion of Chiquadora Ridge, recharge would be maintained into the deep groundwater system supporting the slope wetlands.

TABLE 8-2
SAMP WATERSHED AND SUB-BASIN PLANNING PRINCIPLES CONSISTENCY FINDINGS

PLANNING PRINCIPLES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
<i>Gobernadora Canyon Sub-basinand Central San Juan Subunit North of San Juan Creek</i>				
9. Protect Cañada Gobernadora valley floor above the knickpoint to provide for creek meandering (as occurred historically) and for restoration of riparian processes and habitat.	Consistent. A-5 would not be consistent because it would protect the valley floor above the knickpoint.	Could be Consistent. B-8 would protect the valley floor above the knickpoint. B-8 could be consistent if an additional funding source is identified to implement the Adaptive Management Program, including the Habitat Restoration Plan component.	Consistent. B-10M would be consistent because it would protect the valley floor above the knickpoint, allowing for restoration of creek meander and riparian processes and habitat.	Consistent. B-12 would be consistent because it would protect the valley floor above the knickpoint, allowing for restoration of creek meandering and riparian processes.
10. In order to emulate current hydrologic patterns, development areas should be set back from the valley floor and focus on areas that presently manifest Class D soils runoff characteristics, including those areas with existing hardpan caps.	Not Consistent. A-5 would not be consistent because although it proposes development generally set back from the valley floor and located primarily on class C and D soils, a portion of the “development bubble” would allow development to the edge of the valley floor in a few locations and would allow for development in the alluvial side canyons.	Not Consistent. B-8 would not be consistent because although it proposes development generally set back from the valley floor and located primarily on class C and D soils, a portion of the “development bubble” would allow development to the edge of the valley floor in a few locations and would allow for development in the alluvial side canyons.	Not Consistent. B-10M would not be consistent because although it proposes development generally set back from the valley floor and located primarily on class C and D soils, a portion of the “development bubble” would allow development to the edge of the valley floor in a few locations and would allow for development in the alluvial side canyons.	Not Consistent. B-12 would not be consistent because although it proposes development generally set back from the valley floor and located primarily on class C and D soils, a portion of the “development bubble” would allow development to the edge of the valley floor.
11. Deep alluvial deposits that function as important infiltration/recharge areas underlie the valley floor and adjacent tributary swales. At the same time, any changes in future stormwater flows to these areas may need to be accompanied by groundwater management due to limited infiltration capacity resulting from high groundwater levels.	Consistent. A-5 would be consistent because it would provide for the ability to implement groundwater management.	Consistent. B-8 would be consistent because it would provide for the ability to implement groundwater management. Management of water quality would occur in compliance with the Water Quality Management Plan.	Consistent. B-10M would be consistent because it would include special groundwater management provisions for Gobernadora as part of the Water Quality Management Plan “conditions of concern” element.	Consistent. B-12 would be consistent because it would include special groundwater management provisions for Gobernadora as part of the Water Quality Management Plan “conditions of concern” element.

TABLE 8-2
SAMP WATERSHED AND SUB-BASIN PLANNING PRINCIPLES CONSISTENCY FINDINGS

PLANNING PRINCIPLES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
12. Given the size of the valley floor, there are opportunities for creating natural treatment systems to treat potential existing and future urban runoff from the Gobernadora sub-basin, as well as provide opportunities for expanded wetlands habitat areas.	Not Consistent. A-5 would not be consistent because while it could provide for natural treatment systems, it does not propose an Adaptive Management Program including a Habitat Restoration Plan.	Consistent. B-8 would be consistent because it would provide for the use of tributary side canyons for stormwater and water quality management. Opportunities for expanded wetlands habitat areas would be preserved above the knickpoint.	Consistent. B-10M would be consistent because it would provide for the use of tributary side canyons for stormwater and water quality management. Opportunities for expanded wetlands habitat areas would be preserved above the knickpoint.	Consistent. B-12 would be consistent because it would provide for the use of tributary side canyons for stormwater and water quality management. Opportunities for expanded wetlands habitat areas would be preserved above the knickpoint.
13. Sediment management and creek restoration activities may be necessary in lower Gobernadora Canyon to address the present excessive sediment input from upstream urbanized areas. The increased sediment resulting from upstream construction will likely be moving through the system for a prolonged period. Eventually, sediment loads may decrease due to buildout of the upper watershed. Consequently, floodplain restoration should account for both the existing and potential future sediment regimes.	Not Consistent. A-5 would not be consistent because the Adaptive Management Program including the Habitat Restoration Plan would not be implanted under the A-5 Alternative.	Could be Consistent. B-8 could be consistent if an additional funding source is identified to implement the Adaptive Management Program, including the Habitat Restoration Plan component.	Consistent. B-10M would be consistent because this alternative provides for implementation of the Aquatic Resources Restoration Plan which identifies potential restoration actions for Sulphur Canyon and Gobernadora Creek. In addition, this alternative proposes implementation of the Gobernadora Multipurpose Basin to address upstream flow and sediment generation.	Consistent. B-12 would be consistent because this alternative provides for implementation of the Aquatic Resources Restoration Plan which identifies potential restoration actions for Sulphur Canyon and Gobernadora Creek. In addition, this alternative proposes implementation of the Gobernadora Multipurpose Basin to address upstream flow and sediment generation.
14. Existing channel incision that has isolated the creek from the floodplain in some areas should be addressed as part of the restoration effort.	Not Consistent. A-5 would not be consistent because the Adaptive Management Program including the Habitat Restoration Plan would not be implanted under the A-5 Alternative.	Could be Consistent. B-8 could be consistent if an additional funding source is identified to implement the Adaptive Management Program, including the Habitat Restoration Plan component.	Consistent. B-10M would be consistent because this alternative provides for implementation of the Aquatic Resources Restoration Plan which identifies potential restoration actions for Sulphur Canyon and Gobernadora Creek. In addition, this alternative proposes implementation of the Gobernadora Multipurpose Basin to address	Consistent. B-12 would be consistent because this alternative provides for implementation of the Aquatic Resources Restoration Plan which identifies potential restoration actions for Sulphur Canyon and Gobernadora Creek. In addition, this alternative proposes implementation of the Gobernadora Multipurpose Basin to address

TABLE 8-2
SAMP WATERSHED AND SUB-BASIN PLANNING PRINCIPLES CONSISTENCY FINDINGS

PLANNING PRINCIPLES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
			upstream flow and sediment generation.	upstream flow and sediment generation
15. Protect the GERA and, to the extent feasible, minimize impacts to major riparian areas consistent with the overall restoration and management plan.	Consistent. A-5 would be consistent because it would avoid impacts to jurisdictional riparian areas including GERA and the "fertile crescent."	Consistent. B-8 would be consistent because it would protect GERA, and other major upstream and downstream riparian areas, except in the "fertile crescent" area.	Consistent. B-10M would be consistent because it would protect GERA, and other major upstream and downstream riparian areas, except in the "fertile crescent" area.	Consistent. B-12 would be consistent because it would avoid impacts to GERA and other upstream and downstream riparian areas, although it would impact the "fertile crescent" area.
16. In order to help maintain the sediment transport functions of the central reach of San Juan Creek, the timing of peak flows in Cañada Gobernadora at the confluence with San Juan Creek should be managed to emulate existing conditions and avoid coincident peaks flows with San Juan Creek.	Could be Consistent. A-5 could be consistent because development could provide for the management of peak flows.	Consistent. B-8 would be consistent because under the Water Quality Management Plan new development would be required to regulate the timing of peak flows in order to avoid coincident peak flows with San Juan Creek	Consistent. B-10M would be consistent because under the Water Quality Management Plan new development would be required to regulate the timing of peak flows in order to avoid coincident peak flows with San Juan Creek.	Consistent. B-12 would be consistent because under the Water Quality Management Plan new development would be required to regulate the timing of peak flows in order to avoid coincident peak flows with San Juan Creek
Trampas Canyon Subunit and Central San Juan Subunit South of San Juan Creek				
17. Trampas Canyon is suitable for development	Consistent. A-5 would be consistent because it proposes development in Trampas Canyon.	Consistent. B-8 would be consistent because it proposes development in Trampas Canyon.	Consistent. B-10M would be consistent because it proposes development in Trampas Canyon.	Consistent. B-12 would be consistent because it proposes development in Trampas Canyon.
18. Focus development in Trampas Canyon in disturbed and adjacent areas with low to moderate hydrologic, water quality and habitat integrity function and value.	Not Consistent. A-5 would not be consistent because it proposes development outside of Trampas Canyon.	Consistent. B-8 would be consistent because it would confine development to Trampas Canyon.	Consistent. B-10M would be consistent because it would confine development to Trampas Canyon.	Consistent. B-12 would be consistent because it would confine development to Trampas Canyon.
19. The area along Radio Tower Road should be protected because it contains a diversity of wetland types and endangered fairy shrimp in close proximity to one another, thereby increasing the heterogeneity of the landscape from an aquatic resources perspective.	Consistent. A-5 would be consistent because it would avoid the area along Radio Tower Road and protect the diversity of wetland types and the fairy shrimp.	Not Consistent. B-8 would not be consistent because it would impact one area of vernal pools that support fairy shrimp. Avoidance of the vernal pool is not feasible because of the reduced development acreage available under this alternative.	Consistent. B-10M would be consistent because it would avoid the area along Radio Tower Road and protect the diversity of wetland types and the fairy shrimp through implementation of avoidance measures.	Consistent. B-12 would be consistent because it would avoid the area along Radio Tower Road and protect the diversity of wetland types and the fairy shrimp through implementation of avoidance measures.

TABLE 8-2
SAMP WATERSHED AND SUB-BASIN PLANNING PRINCIPLES CONSISTENCY FINDINGS

PLANNING PRINCIPLES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
Verdugo Canyon Sub-basin				
20. Stormwater flows from Trampas Creek into San Juan Creek should be managed to provide flows comparable to existing conditions.	Could be Consistent. A-5 could be consistent, because although not be obligated to maintain stormwater flows into San Juan Creek, it likely would do so as part of its overall stormwater system.	Not Applicable. B-8 proposes no development within the Verdugo sub-basin therefore development related stormwater flow management would not be necessary.	Consistent. B-10M would be consistent because it would maintain flows comparable to existing conditions in conjunction with its stormwater and dry season flows management system per the Water Quality Management Plan.	Consistent. B-12 would be consistent because it would maintain flows comparable to existing conditions in conjunction with its stormwater and dry season flows management system per the Water Quality Management Plan.
21. Development with impervious surfaces should be limited in extent in order to protect the generation and transport of sediment to downstream areas, and to protect Verdugo Canyon from excessive erosion.	Not Consistent. A-5 would not be consistent because although it proposes limited development in Verdugo Canyon, a collector road to connect with development in upper Gabino Canyon may be required, thus potentially affecting sediment processes.	Consistent. B-8 would be consistent because it proposes no development in the Verdugo sub-basin.	Not Consistent. B-10M would not be consistent because development within the Verdugo sub-basin is extensive, although within Verdugo Canyon itself there would be virtually no development that would adversely affect the generation and transport of coarse sediments.	Consistent. B-12 would be consistent because development within the Verdugo sub-basin is limited to 550 acres. SMWD proposes an uncovered storage reservoir south of the mainstem canyon. In Verdugo Canyon itself there would be virtually no development that would adversely affect the generation and transport of coarse sediments.
22. Development should be set back from significant riparian vegetation within the relatively narrow and geologically confined floodplain.	Not Consistent. A-5 would not be consistent substantial buffers from significant riparian vegetation would not be provided under this alternative.	Not Applicable B-8 proposes no development in the Verdugo sub-basin.	Consistent. B-10M would be consistent because it would avoid riparian vegetation within the mainstem of Verdugo Canyon.	Consistent. B-12 would be consistent because it would avoid riparian vegetation within the mainstem of Verdugo Canyon.
23. Infiltration functions should be protected through site design. Cumulative stormwater flows should be managed in such a way as to not change peak flows that under present conditions lag behind those of the mainstem of San Juan Creek. The area adjacent to the mouth of Verdugo Canyon provides opportunities for infiltration and flow attenuation.	Could be Consistent. A-5 could be consistent through implementation of the water quality management measures to maintain the existing relationship of peak flows.	Not Applicable B-8 proposes no development in the Verdugo sub-basin.	Consistent. B-10M would be consistent because it would provide for infiltration functions by avoiding Verdugo Canyon. Storm flows from development elsewhere in the Verdugo sub-basin would be managed to maintain the existing relationship of peak flows per the Water Quality Management Plan.	Consistent. B-12 would be consistent because it would provide for infiltration functions by avoiding Verdugo Canyon. Storm flows from development elsewhere in the Verdugo sub-basin would be managed to maintain the existing relationship of peak flows per the Water Quality Management Plan.

TABLE 8-2
SAMP WATERSHED AND SUB-BASIN PLANNING PRINCIPLES CONSISTENCY FINDINGS

PLANNING PRINCIPLES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
SAN MATEO CREEK WATERSHED				
<i>Cristianitos Canyon Sub-basin</i>				
24. The headwater area should be protected, with new impervious surfaces limited in extent within the headwater area.	Not Consistent. A-5 would not be consistent because it proposes significant development within the headwater area.	Consistent. B-8 would be consistent because it does not propose development within the headwater area.	Not Consistent. B-10M would not be consistent because low-density estate residential development is proposed within the headwater area.	Consistent. B-12 would be consistent because it does not propose development within the headwater area.
25. Where feasible, protected headwater areas should be targeted for restoration of native vegetation to reduce the generation of fine sediments from the clayey terrains and to promote infiltration, and to enhance the value of upland vegetations adjacent to the streams.	Not Consistent. A-5 would not be consistent because it proposes significant development within the headwater area. Furthermore, the Adaptive Management Program, including the Habitat Restoration Plan component, would not be implemented under A-5.	Could be Consistent. B-8 does not propose development in upper Cristianitos Canyon. B-8 could be consistent if an additional funding source is identified to implement the Adaptive Management Program, including the Habitat Restoration Plan component.	Not Consistent. B-10M would not be consistent because the development pattern of low-density estate residential, golf course and golf residential would preclude full implementation of the restoration recommendations for the sub-basin.	Consistent. B-12 would be consistent because it does not propose development within the headwater area and implementation of the restoration recommendations for the sub-basin could occur.
26. In order to emulate existing hydrologic conditions, development should focus on areas with clayey soils, which presently seal fairly quickly under storm conditions and have relatively high runoff rates. The overall goal should be to reduce the generation of fine sediments compared with existing conditions to reduce turbidity effects and other adverse impacts of fine sediments on downstream aquatic resources. Development in the middle and lower reach areas should be set back from the creek and should be located in higher areas to the east of the creek where existing	Not Consistent. A-5 would not be consistent because while it proposes development in areas that are primarily clay soils, development would not be set back from the creek.	Not Consistent. B-8 would not be consistent because it proposes no development within the Cristianitos sub-basin, and therefore generation of fine sediments from erodible clay soils would continue.	Consistent. B-10M would be consistent because the development pattern and uses proposed by this alternative would be setback from the creek thus reducing the generation of fine sediments.	Consistent. B-12 would be consistent because it proposes very limited development within the Cristianitos sub-basin. New disturbances in the sub-basin would be limited to 50 acres of new citrus and 25 acres for a new Ranch operations center. B-12 proposes a Habitat Restoration Plan component of the Adaptive Management Program that would help reduce the generation of fine sediments.

TABLE 8-2
SAMP WATERSHED AND SUB-BASIN PLANNING PRINCIPLES CONSISTENCY FINDINGS

PLANNING PRINCIPLES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
erosion could be concurrently addressed.				
27. Stream stabilization opportunities should be examined in Cristianitos Creek (above the confluence with Gabino Creek) in the context of longer-term geologic processes.	Not Consistent. A-5 would not be consistent because substantial development would occur east of the creek and in the headwater area and thus stream stabilization opportunities would not likely be able to be addressed. Furthermore, no Adaptive Management Program or Habitat Restoration Plan is proposed under A-5.	Could be Consistent. B-8 could be consistent if an additional funding source is identified to implement the Adaptive Management Program, including the Habitat Restoration Plan component.	Consistent. B-10M would be consistent because it proposes a development pattern and type of development that would provide for stream stabilization opportunities. In addition, B-10M would implement the Habitat Restoration Plan component of the Adaptive Management Program which includes stream stabilization in Cristianitos Creek.	Consistent. B-12 would be consistent because it proposes very limited development in the Cristianitos sub-basin. New citrus and the Ranch operations center would be sited so as not to preclude stream stabilization opportunities. In addition, B-12 would implement the Habitat Restoration Plan component of the Adaptive Management Program which includes stream stabilization in Cristianitos Creek.
28. The alkali wetlands within the middle portion of the sub-basin should be protected in conjunction with protection of the overall riparian system.	Consistent. A-5 would be consistent because it would avoid all wetlands and thus would avoid the alkali wetlands.	Consistent. B-8 would be consistent because it proposes no development in the Cristianitos sub-basin and therefore would avoid the alkali wetlands and overall riparian system.	Consistent. B-10M would be consistent because it avoids wetland/riparian vegetation, including the alkali wetlands associated with Cristianitos Creek.	Consistent. B-12 would be consistent because it proposes very limited development in the Cristianitos sub-basin. New citrus and the Ranch operations center would be sited to avoid the alkali wetlands and overall riparian system.
<i>Gabino and Blind Canyons Sub-basin</i>				
29. Limit new impervious surfaces in the headwater area to locations that will not adversely impact runoff patterns.	Not Consistent. A-5 would not be consistent because it proposes development in the headwaters area in Upper Gabino.	Consistent. B-8 would be consistent because it proposes no development in the Gabino sub-basin.	Consistent. B-10M would be consistent because it proposes only 10 estate lots within the western portion of the Upper Gabino Subunit of the Gabino sub-basin and would have minimal impact on runoff patterns.	Consistent. B-12 would be consistent because it proposes no development in the Gabino sub-basin.
30. Protect the headwaters through restoration of existing gullies using a combination of slope stabilization, grazing management, and native	Not Consistent. A-5 would not be consistent because it proposes development in areas shown for CSS/VGL enhancement and restoration and no Adaptive	Could be Consistent. B-8 could be consistent because it proposes no development in sub-basin. For B-8 to be consistent, an additional funding source would have to be identified to	Consistent. B-10M would be consistent because through implementation of the Habitat Restoration Plan component of the Adaptive Management Program,	Consistent. B-12 would be consistent because through implementation of the Habitat Restoration Plan component of the Adaptive Management Program,

TABLE 8-2
SAMP WATERSHED AND SUB-BASIN PLANNING PRINCIPLES CONSISTENCY FINDINGS

PLANNING PRINCIPLES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
grasslands and/or scrub restoration. To the extent feasible, restore native grasses to reduce sediment generation and promote infiltration of stormwater.	Management Program is proposed.	implement the Adaptive Management Program, including the Habitat Restoration Plan component.	fine sediment yields would be decreased.	fine sediment yields would be decreased.
31. Modify grazing management in the upper portion of the sub-basin to support restoration and vegetation management in the headwater areas.	Not Consistent. Under A-5, this recommendation would not be consistent because there would be no grazing in Upper Gabino due to development.	Could be Consistent. B-8 could be consistent if an additional funding source was identified to implement the Adaptive Management Program.	Consistent. B-10M would be consistent because it would implement the Adaptive Management Program and the Grazing Management Plan.	Consistent. B-12 would be consistent because it would implement the Adaptive Management Program and the Grazing Management Plan.
32. Minimize impacts to the steep side canyons in the middle portion of the sub-basin by limiting new impervious surfaces.	Not Consistent. A-5 would not be consistent because it would allow development in the middle portion of the sub-basin.	Consistent. B-8 would be consistent because no development in Middle Gabino is proposed.	Consistent. B-10M would be consistent because no development in Middle Gabino is proposed.	Consistent. B-12 would be consistent because no development in Middle Gabino is proposed.
33. To the extent feasible, focus development in the clayey soils and terrains in the lower portions of the sub-basin, where it could serve to reduce the generation of fine sediments and associated turbidity.	Not Consistent. A-5 would not be consistent because it would allow development in each of the three major reaches in the Gabino sub-basin. In addition, no Adaptive Management Program is proposed under A-5.	Not Consistent. B-8 proposes no development in upper Gabino Canyon that could serve to reduce the generation of fine sediments and associated turbidity.	Consistent. B-10M would be consistent because, it focuses development on clayey soils and terrains to address the generation of fine sediments.	Not Consistent. B-12 proposes no development in upper Gabino Canyon that could serve to reduce the generation of fine sediments and associated turbidity.
34. To the extent feasible, utilize the side canyon currently degraded by past mining activities for natural water quality treatment systems.	Consistent. A-5 would be consistent because it would allow for use of the degraded side-canyon for natural water quality treatment systems.	Not applicable. B-8 proposes no development in the Gabino sub-basin, therefore water quality treatment facilities would be unnecessary.	Consistent. B-10M would be consistent because it would allow for use of the degraded side-canyon for natural water quality treatment systems through implementation of the Water Quality Management Plan.	Not applicable. B-12 proposes no development in the Gabino Creek portion of the Gabino and Blind Canyons subunit and therefore water treatment facilities would not be necessary.
35. In the lower reach of the creek, protect significant riparian vegetation along the south side of the creek and on proximate side canyon slopes. Limit development and other uses in Blind Canyon to the grazed areas on the mesa and away	Not Consistent. A-5 would not be consistent because it would allow development along the south side of the creek and on proximate side canyon slopes. A-5 would provide for comprehensive water quality treatment through water quality management measures.	Consistent. B-8 would be consistent because it proposes no development within the Gabino sub-basin.	Could be Consistent. B-10M could be consistent if expansion of Cristianitos Road across lower Gabino Creek would avoid significant riparian vegetation. Otherwise B-10M would be consistent because no development is proposed along the south side of	Could be Consistent. B-12 could be consistent because development in PA 8 is limited to a maximum of 500 acres, but the development footprint has not been determined. Development could be sited to avoid major oak woodlands in Blind Canyon. It would avoid riparian

TABLE 8-2
SAMP WATERSHED AND SUB-BASIN PLANNING PRINCIPLES CONSISTENCY FINDINGS

PLANNING PRINCIPLES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
from the major oak woodlands in Blind Canyon. Direct to and treat stormwater runoff in areas that will not contribute to appreciable increases in water delivery/flow to the oak woodlands in the lower portion of the sub-basin.			the Gabino Creek. Development would be focused on the grazed areas on the mesa and away from the major oak woodlands in Blind Canyon. Runoff from the Blind Canyon subunit would be managed through implementation of the Water Quality Management Plan.	vegetation in lower Gabino Creek and it would manage any runoff from the Blind Canyon subunit through implementation of Water Quality Management Plan.
36. Protect the integrity of arroyo toad populations in lower Gabino Creek by maintaining hydrologic and sediment delivery processes, including maintaining the flow characteristics of episodic events in the sub-basin. Utilize natural water quality treatment systems to manage and treat runoff from any new land uses in areas adjacent to the lower creek.	Not Consistent. A-5 would not be consistent because although it would be primarily low-density estate development, the amount of land area that could be developed in the sub-basin is so substantial that maintaining hydrologic and sediment delivery processes would be very difficult. However, due to the low-density character of development, A-5 could utilize natural water quality treatment systems consistent with the second part of the recommendation. A-5 would not provide for comprehensive water quality treatment, although compliance with the County DAMP would be necessary.	Consistent. B-8 would be consistent because it proposes no development within the Gabino sub-basin and existing hydrologic and sediment delivery processes would be maintained.	Could be Consistent. B-10M could be consistent if a substantial bridge or box culvert creek crossing is designed and constructed in association with the expansion of Cristianitos Road to avoid arroyo toad breeding habitat and streamcourse morphology. Development in the Gabino and Blind Canyon subunit would be focused on the grazed areas on the mesa and runoff from Blind Canyon would be managed through implementation of the Water Quality Management Plan.	Consistent. B-12 would be consistent because no development is proposed along Gabino Creek. Development in PA 8 is limited to a maximum of 500 acres, but the development footprint has not been determined. Any development in the Blind Canyon subunit would be focused on the grazed areas on the mesa and runoff from Blind Canyon would be managed through implementation of the Water Quality Management Plan.
La Paz Canyon Sub-basin				
37. Development should be limited in extent in order to protect the generation and transport of coarse sediment to downstream areas. Note: The avoidance of impacts in this sub-basin is extremely important because: (1) La Paz canyon provides a very important source of cobbles that contribute to downstream arroyo toad breeding habitat (in	Consistent. A-5 would be consistent because it proposes no development in this sub-basin.	Consistent. B-8 would be consistent because it proposes no development in this sub-basin.	Consistent. B-10M would be consistent because it proposes no development in this sub-basin.	Consistent. B-12 would be consistent because it proposes no development in this sub-basin.

TABLE 8-2
SAMP WATERSHED AND SUB-BASIN PLANNING PRINCIPLES CONSISTENCY FINDINGS

PLANNING PRINCIPLES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
<p>conjunction with coarse sediments generated within the middle reach of Gabino Canyon) both within the planning area and in the stream system outside the planning area, and (2) episodic storm events occurring within the La Paz Canyon watershed will not be altered in any way, thereby contributing important streamcourse processes for arroyo toad and other aquatic species both within the planning area and downstream of the planning area. Therefore, the protection of the La Paz basin physical processes is an important element in overall consistency of the NCCP/HCP with the Watershed and Sub-Basin Planning Principles.</p>				
38. Development should be set back from riparian vegetation within the relatively narrow and geologically confined riparian zone.	Consistent. A-5 would be consistent because it proposes no development in this sub-basin.	Consistent. B-8 would be consistent because it proposes no development in this sub-basin.	Consistent. B-10M would be consistent because it proposes no development in this sub-basin.	Consistent. B-12 would be consistent because it proposes no development in this sub-basin.
<i>Talega Canyon Sub-basin</i>				
39. To the extent feasible, major stormwater flows from development areas should emulate current runoff patterns. Runoff during the dry season and high frequency/low magnitude storms (generally 1-2 year storm events) should be routed through natural water	Not Consistent. A-5 would not be consistent because of extensive development on side slopes on the ridge above the creek (where Northrop Grumman facilities are currently located). Thus, A-5 would not be able to feasibly route flows back up and over the ridge for much of the development area.	Not Applicable. B-8 proposes no development within the Talega sub-basin, therefore development related runoff management would not be necessary.	Consistent. B-10M would be consistent because under B-10M, the hydrology section of the Water Quality Management Plan indicates that routing both dry season flows and 1-2 year storm flows in excess of existing conditions toward Blind Canyon would occur, and current runoff patterns would be emulated..	Consistent. B-12 would be consistent because the hydrology section of the Water Quality Management Plan indicates that with the implementation of Best Management Practices for the future 500 acres of development, current runoff patterns would be emulated.

TABLE 8-2
SAMP WATERSHED AND SUB-BASIN PLANNING PRINCIPLES CONSISTENCY FINDINGS

PLANNING PRINCIPLES	ALTERNATIVES			
	A-5	B-8	B-10M	B-12
quality treatment systems and, where feasible, encouraged to flow generally away from arroyo toad habitat in Talega Canyon and toward Blind Canyon.				
40. Development should focus on the ridge tops to avoid the canyon bottoms and preserve the steeper slopes. To the extent practical, development should generally be in the area of the existing Northrop Grumman facilities and adjacent ridges to the east/northeast.	Not Consistent. A-5 would not be consistent because it proposes development on the side slopes as well as the top of the ridges.	Not Applicable. B-8 proposes no development within the Talega sub-basin therefore development related runoff management would not be necessary.	Not Consistent. B-10M would not be consistent because although it proposes development on the ridge tops within the Talega sub-basin to avoid the canyon bottom consistent with the recommendation, it also proposes development within the Blind sub-basin on both ridge tops and the canyon bottom, inconsistent with the recommendation. Development would largely be located on the existing Northrop Grumman uses and the area to the east/northeast, although a portion of the development area would extend south of the existing Northrop Grumman facilities.	Could be Consistent. B-12 could be consistent because development in PA 8 is limited to a maximum of 500 acres, but the development footprint has not been determined. It could be consistent because it proposes development on the ridge tops within the Talega sub-basin to avoid the canyon bottom consistent with the recommendation, but any development within the Blind sub-basin on both ridge tops and the canyon bottom, would be inconsistent with the recommendation. It is anticipated that development would largely be located on the existing Northrop Grumman uses and the area to the east/northeast, although a portion of the development area could extend south of the existing Northrop Grumman facilities.
41. The timing of peak flows should emulate the timing of flows under existing conditions.	Consistent. A-5 likely would be consistent because given the low density nature of development, the timing of peak flows could be managed in order to be consistent because it would implement flow management measures.	Not Applicable. B-8 proposes no development within the Talega sub-basin therefore peak flow management would not be necessary.	Consistent. B-10M would be consistent because the Water Quality Management Plan indicates that the timing of peak flows will emulate existing conditions consistent with the recommendation through the implementation of Best Management Practices.	Consistent. B-12 would be consistent because the Water Quality Management Plan indicates that the timing of peak flows will emulate existing conditions consistent with the recommendation through the implementation of Best Management Practices.

TABLE 8-3
CONSERVATION ANALYSIS OF PLANNING SPECIES UNDER THE 'B' ALTERNATIVES

PLANNING SPECIES	B-8	B-10M	B-12
Arroyo Toad <i>Bufo californicus</i>	100% of breeding locations comprising <i>major and important populations</i> in <i>key locations</i> in San Juan Creek, Bell Canyon, lower Gabino Creek, lower Cristianitos Creek and Talega Creek would be conserved, as well as the majority of adjacent upland habitats. No development would occur in the San Mateo Creek Watershed. Along San Juan Creek, development would be offset an average of about 300 ft north of the floodplain.	100% of breeding locations comprising <i>major and important populations</i> in <i>key locations</i> in San Juan Creek, Bell Canyon, lower Gabino Creek, lower Cristianitos Creek and Talega Creek would be conserved, as well as the majority of adjacent upland habitats. In the San Mateo Creek Watershed the minimum elevation differential between development and breeding locations would be 80 ft. Along San Juan Creek, development would be offset by at least 300 ft south of the floodplain and an average of about 300 ft north of the floodplain.	100% of breeding locations comprising <i>major and important populations</i> in <i>key locations</i> in San Juan Creek, Bell Canyon, lower Gabino Creek, lower Cristianitos Creek and Talega Creek would be conserved, as well as the majority of adjacent upland habitats. In the San Mateo Creek Watershed 5 years of planned toad telemetry studies will be incorporated into the design of the 500 acres of development to be located in Planning Area 8 to minimize impacts to the arroyo toad as specified in proposed SAMP EIS Special Condition I.D.8. Along San Juan Creek, floodplain terraces within 656 ft (200 m) of either side of the creek between Planning Areas 3 and 4 would be conserved per Special Condition I.D.2.
Coastal California Gnatcatcher <i>Polioptila californica californica</i>	615 locations (83%) and 17,985 acres (86%) of suitable habitat would be conserved, including 383 of 404 locations (95%) and 3,032 acres of 3,126 acres of coastal sage scrub (97%) within the <i>major population/key location</i> in the Chiquita Canyon and Wagon Wheel sub-basins and Chiquadora Ridge portion of the Gobernadora sub-basin. For <i>important populations</i> B-8 would include: 7 of 8 locations (87%) of the Avenida Pico <i>important population/key location</i> ; 14 of 15 locations (93%) of the East Caspers Wilderness Park <i>important population</i> (one location is mapped in the Nichols Institute property); 40 of 52 locations (77%) of the East Coto de Caza/Starr Ranch <i>important population/key location</i> ; 9 of 28 locations (32%) of the East San Juan Capistrano <i>important population/key location</i> (17 locations are mapped on the Whispering Hills development project area); 15 of 21 locations (71%) of the North San Clemente <i>important population/key location</i> ; 6 of 7	579 locations (79%) and 16,798 acres (81%) of suitable habitat would be conserved, including 352 of 404 locations (87%) and 2,768 acres of 3,126 acres of coastal sage scrub (89%) within the <i>major population/key location</i> in the Chiquita Canyon and Wagon Wheel sub-basins and Chiquadora Ridge portion of the Gobernadora sub-basin. For <i>important populations</i> B-10M would include: 7 of 8 locations (87%) of the Avenida Pico <i>important population/key location</i> ; 14 of 15 locations (93%) of the East Caspers Wilderness Park <i>important population</i> (one location is mapped in the Nichols Institute property); 40 of 52 locations (77%) of the East Coto de Caza/Starr Ranch <i>important population/key location</i> ; 9 of 28 locations (39%) of the East San Juan Capistrano <i>important population/key location</i> (17 locations are mapped on the Whispering Hills development project area); 15 of 21 locations (71%) of the North San Clemente <i>important population/key location</i> ; 6 of 7 locations (86%) of the Trampas Canyon <i>important</i>	568 locations (77%) and 16,727 acres (80%) of suitable habitat (coastal sage scrub) would be conserved, including 345 of 404 locations (85%) and 2,768 acres of 3,126 acres of coastal sage scrub (89%) within the <i>major population</i> in the Chiquita Canyon and Wagon Wheel sub-basins and Chiquadora Ridge portion of the Gobernadora sub-basin. For <i>important populations</i> the B-12 would include: 7 of 8 locations (87%) of the Avenida Pico <i>important population/ key location</i> ; 14 of 15 locations (93%) of the East Caspers Wilderness Park <i>important population</i> (one location is mapped in the Nichols Institute property); 40 of 52 locations (77%) of the East Coto de Caza/Starr Ranch <i>important population/key location</i> ; 8 of 28 locations (29%) of the East San Juan Capistrano <i>important population/key location</i> (17 locations are mapped on the Whispering Hills development project area); 15 of 21 locations (71%) of the North San Clemente <i>important</i>

TABLE 8-3
CONSERVATION ANALYSIS OF PLANNING SPECIES UNDER THE 'B' ALTERNATIVES

PLANNING SPECIES	B-8	B-10M	B-12
	locations (86%) of the Trampas Canyon <i>important population/key location</i> ; 34 of 35 locations (97%) of the West San Juan Capistrano <i>important population/ key location</i> ; 28 of 41 locations (68%) of the Arroyo Trabuco <i>important population</i> ; all 13 locations in the Upper Cristianitos Canyon <i>important population</i> ; 5 of 6 locations (83%) of the West Foot-Trabuco Specific Plan <i>important population/key location</i> ; and 2 of 14 locations (14%) of the East Foothill-Trabuco <i>important population</i> . A total of 550 of 644 locations (85%) within <i>major and important populations</i> would be in the B-8.	<i>population/key location</i> ; 34 of 35 locations (97%) of the West San Juan Capistrano <i>important population/ key location</i> ; 28 of 41 locations (68%) of the Arroyo Trabuco <i>important population</i> ; all 13 locations of the Upper Cristianitos <i>important population</i> ; 5 of 6 locations (83%) in the West Foot-Trabuco Specific Plan <i>important population/key location</i> ; and 2 of 14 locations (14%) of the East Foothill-Trabuco <i>important population</i> . A total of 525 of 644 locations (82%) within <i>major and important populations</i> would be in the B-10M.	<i>population/key location</i> ; 6 of 7 locations (86%) of the Trampas Canyon <i>important population/key location</i> ; 12 of 13 locations (92%) of the Upper Cristianitos <i>important population/key location</i> ; 34 of 35 locations (97%) of the West San Juan Capistrano <i>important population/key location</i> ; 28 of 41 locations (68%) of the Arroyo Trabuco <i>important population</i> ; 5 of 6 locations (83%) of the West Foot-Trabuco Specific Plan <i>important population/key location</i> and 2 of 14 locations (14%) of the East Foothill-Trabuco <i>important population</i> . A total of 516 of 644 locations (80%) within <i>major and important populations</i> would be in the B-12.
Least Bell's Vireo <i>Vireo bellii pusillus</i>	50 of 63 breeding locations (79%) and 845 acres (76%) of southern willow scrub/arroyo willow riparian forest would be conserved. Both <i>important populations</i> in the planning area – in GERA and Arroyo Trabuco – would be conserved.	50 of 63 breeding locations (79%) and 840 acres (76%) of southern willow scrub/arroyo willow riparian forest would be conserved. Both <i>important populations</i> in the planning area – in GERA and Arroyo Trabuco – would be conserved..	50 of 63 breeding locations (79%) and 837 acres (75%) of southern willow scrub/arroyo willow riparian forest would be conserved. Both <i>important populations</i> in the planning area – in GERA and Arroyo Trabuco – would be conserved.
Southwestern Willow Flycatcher <i>Empidonax traillii extimus</i>	7 of 7 breeding locations and 845 acres (76%) of southern willow scrub/arroyo willow riparian forest would be conserved. The single identified <i>important population</i> in GERA would be conserved.	7 of 7 breeding locations and 840 acres (76%) of southern willow scrub/arroyo willow riparian forest would be conserved. The single identified <i>important population</i> in GERA would be conserved.	7 of 7 breeding locations and 837 acres (75%) of southern willow scrub/arroyo willow riparian forest would be conserved. The single identified <i>important population</i> in GERA would be conserved.
Riverside Fairy Shrimp <i>Streptocephalus woottoni</i>	2 of 3 vernal pools supporting Riverside fairy shrimp would be conserved; the Chiquita Ridge Pool 4 and Pool 2 along Radio Tower Road. Pool 7 along Radio Tower Road would be impacted by the Trampas Canyon development. Avoidance of the Pool 7 is not feasible because of the reduced development acreage available under this Alternative. Vernal pools supporting the species on Saddleback Meadows have been addressed in the Section 7 consultation for that project.	The 3 vernal pools supporting Riverside fairy shrimp on Chiquita Ridge (no. 4) and along Radio Tower Road (nos. 2 and 7), including their contributing hydrological sources, would be conserved. The easternmost pool (Pool 7) on Radio Tower Road would be avoided through project design. Vernal pools supporting the species on Saddleback Meadows have been addressed in the Section 7 consultation for that project.	The 3 vernal pools supporting Riverside fairy shrimp on Chiquita Ridge (no. 4) and along Radio Tower Road (nos. 2 and 7), including their contributing hydrological sources, would be conserved. The easternmost pool (Pool 7) on Radio Tower Road would be avoided through project design. Vernal pools supporting the species on Saddleback Meadows have been addressed in the Section 7 consultation for that project.
San Diego Fairy Shrimp <i>Branchinecta sandiegonensis</i>	4 of 5 vernal pools supporting San Diego fairy shrimp would be conserved; Pools 4 and 6 on Chiquita Ridge and Pools 1 and 2 along Radio	The 5 vernal pools supporting San Diego fairy shrimp on Chiquita Ridge and along Radio Tower Road, including their contributing hydrological	The 5 vernal pools supporting San Diego fairy shrimp on Chiquita Ridge and along Radio Tower Road, including their contributing

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CONSERVATION ANALYSIS OF PLANNING SPECIES UNDER THE 'B' ALTERNATIVES

PLANNING SPECIES	B-8	B-10M	B-12
	Tower Road. Pool 7 along Radio Tower Road would be impacted by the Trampas Canyon development. Avoidance of Pool 7 is not feasible because of the reduced development acreage available under this Alternative.	sources, would be conserved. The easternmost pool (Pool 7) on Radio Tower Road would be avoided through project design.	hydrological sources, would be conserved. The easternmost pool (Pool 7) on Radio Tower Road would be avoided through project design.
Thread-leaved Brodiaea <i>Brodiaea filifolia</i>	9,397 flowering stalks (98%) and 32 of 37 locations (92%) would be conserved. The two <i>major populations/ key locations</i> located on Chiquadora Ridge and in southern Cristianitos/Gabino canyons would be conserved. 100% of <i>important populations</i> in Cristianitos Canyon, Middle Gabino, Trampas Canyon, Talega sub-basin, and Arroyo Trabuco also would be conserved.	9,217 flowering stalks (97%) and 27 of 34 locations (73%) would be conserved. The location supporting 2,000 flowering stalks in the Chiquadora Ridge <i>major population/ key location</i> would be conserved, as would 2 smaller populations totaling about 10 flowering stalks. 11 locations totaling about 210 flowering stalks in the <i>important population</i> Cristianitos would be conserved, as would 100% of the Middle Gabino, Trampas Canyon, East Talega and Arroyo Trabuco <i>important populations</i> .	9,250 flowering stalks (98%) and 21 of 37 locations (57%) would be conserved. The <i>major population/ key location</i> totaling 6,105 flowering stalks located in southern Cristianitos/Gabino canyons would be 100% conserved. The location supporting 2,000 flowering stalks in the Chiquadora Ridge <i>major population/ key location</i> would be avoided through project design, and 4 smaller populations totaling about 85 flowering stalks would be developed. Conservation of <i>important populations</i> includes 7 locations (54%) and 341 individuals (85%) of the Cristianitos Canyon population; all 4 locations totaling 288 individuals of the East Talega population; one location (100%) and all 80 individuals in the Lower Arroyo Trabuco population; one location (100%) and all 183 individuals in the Middle Gabino population; and one location (100%) and all 250 individuals in the Trampas Canyon population.
Cactus Wren <i>Campylorhynchus brunneicapillus couesi</i>	1,221 locations (86%) and 17,985 acres (86%) of suitable habitat (coastal sage scrub) would be conserved. Habitat connectivity would be maintained, including: north-south connections along Chiquita and Chiquadora ridges; east-west connectivity between Arroyo Trabuco and Caspers Wilderness Park; along the San Juan Creek floodplain; north-south connections through the Trampas sub-basin and southern portion of Chiquita sub-basins, leading to the Donna O'Neill Land Conservancy and Cristianitos Canyon; and throughout the remainder of the San Mateo Creek Watershed.	1,099 locations (78%) and 16,798 acres (81%) of suitable habitat (coastal sage scrub) would be conserved. Habitat connectivity would be maintained, including: north-south connections along Chiquita and Chiquadora ridges; east-west connectivity between Arroyo Trabuco and Caspers Wilderness Park; along the San Juan Creek floodplain; north-south connections through the Trampas sub-basin and southern portion of Chiquita sub-basins, leading to the Donna O'Neill Land Conservancy and Cristianitos Canyon; and throughout the remainder of the San Mateo Creek Watershed.	1,094 locations (78%) and 16,727 acres (80%) of suitable habitat (coastal sage scrub) would be conserved. Habitat connectivity would be maintained, including: north-south connections along Chiquita and Chiquadora ridges; east-west connectivity between Arroyo Trabuco and Caspers Wilderness Park; along the San Juan Creek floodplain; north-south connections through the Trampas sub-basin and southern portion of Chiquita sub-basins, leading to the Donna O'Neill Land Conservancy and Cristianitos Canyon; and throughout the remainder of the San Mateo Creek Watershed.

TABLE 8-3
CONSERVATION ANALYSIS OF PLANNING SPECIES UNDER THE 'B' ALTERNATIVES

PLANNING SPECIES	B-8	B-10M	B-12
Cooper's Hawk <i>Accipiter cooperii</i>	41 historic nest locations (93%) and 6,618 acres (85%) of suitable habitat (riparian, woodlands and forest) would be conserved. No major/important populations identified, but breeding and foraging habitat within the major drainages would be conserved, including Talega, Cristianitos, Gabino, La Paz, San Juan, Gobernadora, Verdugo, and Arroyo Trabuco.	37 historic nest locations (84%) and 6,330 acres (82%) of suitable habitat (riparian, woodlands and forest) would be conserved. No major/important populations were identified, but breeding and foraging habitat within the major drainages would be conserved, including Talega, Cristianitos, Gabino, La Paz, San Juan, Chiquita, Gobernadora, Verdugo, and Arroyo Trabuco.	38 historic nest locations (80%) and 6,307 acres (81%) of suitable habitat (riparian, woodlands and forest) would be conserved. No major/important populations were identified, but breeding and foraging habitat within the major drainages would be conserved, including Talega, Cristianitos, Gabino, La Paz, San Juan, Chiquita, Gobernadora, Verdugo, and Arroyo Trabuco.
Golden Eagle <i>Aquila chrysaetos</i>	14,187 acres (73%) of grassland and agricultural foraging habitat would be conserved. Golden eagles, which nest in the CNF, would be expected to continue to occasionally forage, as they do currently, in Chiquita Canyon, and throughout the San Mateo Creek Watershed.	12,435 acres (64%) of grassland and agricultural foraging habitat would be conserved. Golden eagles, which nest in the CNF, would be expected to continue to occasionally forage, as they do currently, in Upper Chiquita Canyon, Upper Gabino Canyon and Cristianitos Canyon.	11,932 acres (61%) of grassland and agricultural foraging habitat would be conserved. Golden eagles, which nest in the CNF, would be expected to continue to occasionally forage, as they do currently, in Middle and Upper Chiquita Canyon, Upper Gabino Canyon and Cristianitos Canyon.
Grasshopper Sparrow <i>Ammodramus savannarum</i>	626 locations (86%) and 14,187 acres (73%) of grassland and agricultural habitat would be conserved. Approximately 90% of the major population/key location in the Chiquita sub-basin/Chiquadora Ridge area, 72% of the important population/key location on the Radio Tower Road mesa, and 99% of the important population/key location in Cristianitos and Lower Gabino would be conserved.	461 locations (63%) and 12,435 acres (64%) of grassland and agricultural habitat would be conserved. Approximately 58% of the major population/key location in the Chiquita sub-basin/Chiquadora Ridge area, 72% of the important population/key location on the Radio Tower Road mesa, and 71% of the important population/key location in Cristianitos and Lower Gabino would be conserved.	462 locations (63%) and 11,932 acres (61%) of grassland and agricultural habitat would be conserved. Approximately 63% of the major population/key location in the Chiquita sub-basin/Chiquadora Ridge area, 72% of the important population/key location on the Radio Tower Road mesa, and 55% of the important population/key location in Cristianitos and Lower Gabino would be conserved (the latter assumes overstated impact to PAs 6 and 7 where approximately an additional 300 acres of grassland would be conserved with final siting of orchards).
Merlin <i>Falco columbarius</i>	14,187 acres (73%) of grassland and agricultural foraging habitat would be conserved. All identified and potential key foraging habitat throughout the planning area would conserved, including Chiquita Canyo, Radio Tower Road, Cristianitos Canyon and Upper Gabino Canyon.	12,435 acres (64%) of grassland and agricultural foraging habitat would be conserved. Key foraging habitat in Upper Chiquita Canyon would be conserved. Potential foraging habitat in Upper Gabino Canyon and in the Radio Tower Road mesa area also would be conserved. Key foraging habitat in Lower and Middle Chiquita and Cristianitos canyons would be developed.	11,932 acres (61%) of grassland and agricultural foraging habitat would be conserved. Key foraging habitat in Middle and Upper Chiquita Canyon would be conserved. Potential foraging habitat in Upper Gabino Canyon, Cristianitos Canyon and in the Radio Tower Road mesa area also would be conserved. Key foraging habitat in Lower Chiquita would be developed.
Tricolored Blackbird <i>Agelaius tricolor</i>	At least 4 of the 5 historic breeding locations and nearby upland foraging habitat would be conserved. In particular, grassland habitat in the	3 of 5 of the historic breeding locations and nearby upland foraging habitat would be conserved. In particular, grassland habitat in the valley bottom of	At least 4 of the 5 historic breeding locations and nearby upland foraging habitat would be conserved. In particular, grassland habitat in the

TABLE 8-3
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PLANNING SPECIES	B-8	B-10M	B-12
	valley bottom of Lower Gobernadora on RMV property would be conserved to support a breeding population. In combination with the existing breeding ponds in south Coto de Caza, this area supports an <i>important population/key location</i> . Potential breeding/foraging areas also would be conserved in the Narrows area of Chiquita Canyon, San Juan Creek (including the mouth of Verdugo Canyon), south of a ranch residence south of Ortega Highway, and the "Riverside Cement" colony in Lower Cristianitos and Lower Gabino canyons.	Lower Gobernadora on RMV property would be conserved to support a breeding population. In combination with the existing breeding ponds in south Coto de Caza, this area supports an <i>important population/key location</i> . Potential breeding/foraging areas also would be conserved south of a ranch residence south of Ortega Highway. Potential breeding/foraging areas that would be affected by development include the Narrows area of Chiquita Canyon and at the mouth of Verdugo Canyon.	valley bottom of Lower Gobernadora on RMV property would be conserved to support a breeding population. In combination with the existing breeding ponds in south Coto de Caza, this area supports an <i>important population/key location</i> . Potential breeding/foraging areas also would be conserved in the Narrows area of Chiquita Canyon, San Juan Creek (including the mouth of Verdugo Canyon), south of a ranch residence south of Ortega Highway, and the "Riverside Cement" colony in Lower Cristianitos and Lower Gabino canyons.
White-tailed Kite <i>Elanus leucurus</i>	31 historic nest locations (86%) and 6,618 acres (85%) of riparian and woodland habitats would be conserved. In particular, nesting and foraging habitat would be conserved in GERA, Central San Juan Creek, Lower Cristianitos Creek, Middle and Lower Gabino Canyon, La Paz Canyon, and Talega Canyon.	30 historic nest locations (83%) and 6,330 acres (82%) of riparian and woodland habitats would be conserved. In particular, nesting and foraging habitat would be conserved in GERA, Middle Chiquita Canyon, Central San Juan Creek, Lower Cristianitos Creek, Middle and Lower Gabino Canyon, La Paz Canyon, and Talega Canyon.	30 historic nest locations (83%) and 6,307 acres (81%) of riparian and woodland habitats would be conserved. In particular, nesting and foraging habitat would be conserved in GERA, Middle Chiquita Canyon, Central San Juan Creek, Lower Cristianitos Creek, Middle and Lower Gabino Canyon, La Paz Canyon, and Talega Canyon.
Yellow Warbler <i>Dendroica petechia</i>	28 locations (82%) and 4,399 acres (86%) of riparian habitat would be conserved. All four of the <i>important populations</i> would be conserved. Scattered locations in Bell, Lucas and Lower Gobernadora canyons also would be conserved.	28 locations (82%) and 4,347 acres (83%) of riparian habitat would be conserved. All four of the <i>important populations</i> would be conserved. Scattered locations in Bell, Lucas and Lower Gobernadora canyons also would be conserved.	28 locations (82%) and 4,338 acres (85%) of riparian habitat would be conserved. All four of the <i>important populations</i> would be conserved. Scattered locations in Bell, Lucas and Lower Gobernadora canyons also would be conserved.
Yellow-breasted Chat <i>Icteria virens</i>	111 locations (86%) and 4,399 acres (86%) of riparian habitat would be conserved. All five of the <i>important populations</i> would be conserved. Scattered locations in upper San Juan Creek and Middle Chiquita, Bell, Verdugo, Lower Gabino and La Paz canyons also would be conserved.	108 locations (83%) and 4,347 acres (83%) of riparian habitat would be conserved. All five of the <i>important populations</i> would be conserved. Scattered locations in upper San Juan Creek and Middle Chiquita, Bell, Verdugo, Lower Gabino and La Paz canyons also would be conserved.	110 locations (85%) and 4,338 acres (85%) of riparian habitat would be conserved. All five of the <i>important populations</i> would be conserved. Scattered locations in upper San Juan Creek and Middle Chiquita, Bell, Verdugo, Lower Gabino and La Paz canyons also would be conserved.
Western Spadefoot Toad <i>Scaphiopus hammondi</i>	18 locations (75%) and all of three <i>important populations</i> (Chiquita Ridge, Upper Cristianitos, Lower Gabino Creek) would be conserved. Portions of the two other <i>important populations</i> along San Juan Creek and Radio Tower Road would be conserved. All conserved breeding locations, except one in Prima Deshecha, would have at least a 650-ft upland buffer zone from	21 locations (87%) and all of four <i>important populations</i> (Chiquita Ridge, Radio Tower Road, Upper Cristianitos, Lower Gabino Creek). A portion of the fifth <i>important population</i> along San Juan Creek would be conserved. All conserved breeding locations, except one in San Juan Creek adjacent to Planning Area 4 and one in Prima Deshecha, would have at least a 650-ft upland	21 locations (87%) and all of four <i>important populations</i> (Chiquita Ridge, Radio Tower Road, Upper Cristianitos, Lower Gabino Creek) would be conserved. A portion of the fifth <i>important population</i> along San Juan Creek would be conserved. All conserved breeding locations, except one in San Juan Creek adjacent to Planning Area 4 and one in Prima Deshecha,

TABLE 8-3
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PLANNING SPECIES	B-8	B-10M	B-12
	proposed development to support all life stages.	buffer zone from proposed development to support all life stages.	would have at least a 650-ft upland buffer zone from proposed development to support all life stages.
Orange-throated Whiptail <i>Cnemidophorus hyperythrus beldingi</i>	138 locations (79%) and 26,395 acres (86%) of coastal sage scrub, chaparral and woodland would be conserved. All 59 locations in the Chiquita Canyon/Wagon Wheel Canyon and all 18 locations in the Chiquadora Ridge <i>important populations/key locations</i> would be conserved. 16 of 47 locations (34%) of the Gobernadora/San Juan Creek <i>important population/key location</i> would be conserved.	128 locations (74%) and 25,353 acres (79%) of coastal sage scrub, chaparral and woodland would be conserved. All 18 locations in the <i>important population/key location</i> on Chiquadora Ridge and 55 of 59 (93%) of the <i>important population/key location</i> on the Chiquita Canyon/Wagon Wheel Canyon ridgeline would be conserved. In the Gobernadora/San Juan Creek <i>important population/key location</i> 12 of 47 locations (25%) would be conserved.	127 locations (73%) and 25,268 acres (79%) of coastal sage scrub, chaparral and woodland would be conserved. All 18 locations in the <i>important population/key location</i> on Chiquadora Ridge and 57 of 59 locations (97%) in the <i>important population/key location</i> on the Chiquita Canyon/Wagon Wheel Canyon ridgeline would be conserved. In the Gobernadora/San Juan Creek <i>important population/key location</i> 10 of 47 locations (21%) would be conserved.
San Diego Horned Lizard <i>Phrynosoma coronatum blainvillei</i>	51 locations (100%) and 25,176 acres (86%) of coastal sage scrub and chaparral would be conserved. The <i>important populations/key locations</i> in Upper Cristianitos and on the Chiquita Canyon/Wagon Wheel Canyon ridgeline would be 100% conserved.	44 locations (86%) and 23,370 acres (80%) of coastal sage scrub and chaparral would be conserved. The <i>important populations/key locations</i> in Upper Cristianitos and on the Chiquita Canyon/Wagon Wheel Canyon ridgeline would be 100% conserved.	39 locations (76%) and 23,299 acres (79%) of coastal sage scrub and chaparral would be conserved. The Chiquita Canyon/Wagon Wheel Ridgeline <i>important population/ key location</i> would be 100% conserved and 9 of 14 locations (64%) in the Upper Cristianitos <i>important population/ key location</i> would be conserved..
Southwestern Pond Turtle <i>Clemmys marmorata pallida</i>	10 of 12 locations (83%) would be conserved, including <i>important population/ key locations</i> in riparian and aquatic habitats along San Juan Creek, the stockpond and other wetlands in Upper Cristianitos, and Jerome's Lake in Upper Gabino. Locations in San Juan Creek and the adjacent floodplain providing nesting/estivation habitat would also be conserved. All conserved sites would have buffers of at least 328 ft from adjacent development and southern exposures to provide nesting and overwintering sites. Habitat connectivity between the San Juan Creek and San Mateo Creek watersheds would be maintained to allow dispersal.	10 of 12 locations (83%) would be conserved, including <i>important population/ key locations</i> in riparian and aquatic habitats along San Juan Creek, the stockpond and other wetlands in Upper Cristianitos, and Jerome's Lake in Upper Gabino. Locations in San Juan Creek and the adjacent floodplain providing nesting/estivation habitat would also be conserved. Habitat connectivity between the San Juan Creek and San Mateo Creek watersheds would be maintained to allow dispersal, although the habitat linkage would narrow to approximately 1,000 ft in width at the gap between the Trampas Canyon and East Ortega development areas.	9 of 12 locations (75%) would be conserved, including <i>important populations/key locations</i> in riparian and aquatic habitats along San Juan Creek, the stockpond and other wetlands in Upper Cristianitos and Jerome's Lake in Upper Gabino. Locations in San Juan Creek and the adjacent floodplain providing nesting/estivation habitat would also be conserved. All conserved sites would have buffers of at least 328 ft from adjacent development and southern exposures to provide nesting and overwintering sites. Habitat connectivity between the San Juan Creek and San Mateo Creek watersheds would be maintained to allow dispersal.
Mountain Lion <i>Puma concolor</i>	No development is proposed in the RMV portion of the San Mateo Creek Watershed. A large "live-in" block of habitat including the Talega, La Paz, Cristianitos and Gabino and Blind Canyons sub-basins would be conserved. In the San	No development is proposed in the Gabino, La Paz, and eastern portion of the Talega sub-basins resulting in protection of a large "live-in" habitat block in the San Mateo Creek Watershed. The upper portion of the Verdugo sub-basin within the	No development is proposed in the Gabino, La Paz, and eastern portion of the Talega sub-basins, and very little development is proposed in the Cristianitos sub-basin (50 acres of orchard and 25 acres for the Ranch Headquarters), resulting in

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PLANNING SPECIES	B-8	B-10M	B-12
	Juan Creek Watershed, the Verdugo sub-basin would be conserved, providing an uninterrupted link to Caspers Wilderness Park and the CNF. Other areas of B-8 providing for mountain lion movement would be Arroyo Trabuco, the Foothill-Trabuco Specific Plan area, Chiquita Ridge and Canyon, and San Juan Creek.	planning area would be undeveloped, providing a link from Camp Pendleton through to Caspers Wilderness Park and the CNF. Other areas of the proposed permanent open space providing for mountain lion movement would be Arroyo Trabuco, the Foothill-Trabuco Specific Plan area, Chiquita Ridge, Sulphur Canyon, and San Juan Creek.	protection of a large "live-in" habitat block in the San Mateo Creek Watershed. The upper portion of the Verdugo sub-basin within the planning area would be undeveloped, providing a link from Camp Pendleton through to Caspers Wilderness Park and the CNF. Other areas of the proposed permanent open space providing for mountain lion movement would be Arroyo Trabuco, the Foothill-Trabuco Specific Plan area, Chiquita Ridge, Sulphur Canyon, and San Juan Creek.
Mule Deer <i>Odocoileus hemionus</i>	No development is proposed in the RMV portion of the San Mateo Creek Watershed, resulting in protection of a large "live-in" habitat block in the San Mateo Creek Watershed. The Verdugo sub-basin would be conserved, providing an uninterrupted link from Camp Pendleton through to Caspers Wilderness Park and the CNF. Other areas of B-8 providing for mule deer "live-in" and/or movement habitat would be Arroyo Trabuco, the Foothill-Trabuco Specific Plan area, Chiquita Ridge and Canyon, Sulphur Canyon, San Juan Creek, and Trampas Canyon.	No development is proposed in the Gabino, La Paz, and eastern portion of the Talega sub-basins resulting in protection of a large "live-in" habitat block in the San Mateo Creek Watershed. The upper portion of the Verdugo sub-basin within the planning area would be undeveloped, providing a link from Camp Pendleton through to Caspers Wilderness Park and the CNF. Other areas of the proposed permanent open space providing for mule deer "live-in" and/or movement habitat would be Arroyo Trabuco, the Foothill-Trabuco Specific Plan area, Chiquita Ridge, Sulphur Canyon, San Juan Creek, and Trampas Canyon.	No development is proposed in the Gabino, La Paz, and eastern portion of the Talega sub-basins, and very little development is proposed in the Cristianitos sub-basin (50 acres of orchard and 25 acres for the Ranch Headquarters), resulting in protection of a large "live-in" habitat block in the San Mateo Creek Watershed. The upper portion of the Verdugo sub-basin within the planning area would be undeveloped, providing a link from Camp Pendleton through to Caspers Wilderness Park and the CNF. Other areas of the proposed permanent open space providing for mule deer "live-in" and/or movement habitat would be Arroyo Trabuco, the Foothill-Trabuco Specific Plan area, Chiquita Ridge, Sulphur Canyon, San Juan Creek, and Trampas Canyon.
Chaparral Beargrass <i>Nolina cismontana</i>	The Talega sub-basin <i>important population/key location</i> would be conserved.	The Talega sub-basin <i>important population/key location</i> would be conserved.	The Talega sub-basin <i>important population/key location</i> would be conserved.
Coulter's Saltbush <i>Atriplex coulteri</i>	3,086 individuals (100%) and 35 locations (100%) would be conserved.	3,076 individuals (99%) and 33 locations (94%) would be conserved. Only a few individuals in the Middle Chiquita Canyon <i>major population/key location</i> and 1 other non-key location would be impacted.	2,523 individuals (82%) and 31 locations (91%) would be conserved. Conservation of <i>major/important populations</i> includes 1,457 individuals (87%) and 19 locations (83%) of the Middle Chiquita Canyon/Narrows <i>major population/key location</i> , 100% of the Upper Gabino <i>important population</i> , 100% of the Lower Chiquita <i>important population</i> , and 350 individuals (51%) and 4 locations (57%) on the Middle Chiquita north of the Treatment Plant

TABLE 8-3
CONSERVATION ANALYSIS OF PLANNING SPECIES UNDER THE 'B' ALTERNATIVES

PLANNING SPECIES	B-8	B-10M	B-12
			<i>important population</i> (the remainder of this population is mapped in existing orchard).
Many-stemmed Dudleya <i>Dudleya multicaulus</i>	58,834 individuals (90%) and 331 locations (85%) would be conserved. Of the <i>major populations/key locations</i> , 100% of individuals/locations of the Chiquadora Ridge population, the Upper Gabino/La Paz Canyon population, and the Cristianitos Canyon would be conserved. 4% of individuals and 8% of locations of the Gobernadora <i>major population/key location</i> would be conserved. Of the <i>important populations/key locations</i> , 100% of the Chiquita Ridge individuals/locations, 100% of the Lower Chiquita Canyon individuals/locations, and 89% of the individuals and 78% of the locations in the Upper Gobernadora population would be conserved. In the East Talega <i>important population</i> , 100% of the individuals/locations would be conserved.	49,247 individuals (75%) and 281 locations (72%) would be conserved. Of the <i>major populations/key locations</i> , 99% of individuals and 92% of locations of the Chiquadora Ridge population, 100% of individuals and locations of the Cristianitos population, 100% of individuals and locations of the Upper Gabino/La Paz Canyon population, and 4% of individuals and 5% of locations of the Gobernadora population would be conserved. Of the <i>important populations/key locations</i> , 100% of the Chiquita Ridge individuals/locations, 89% of the individuals and 87% of the locations in the Upper Gobernadora population, and 10% of the individuals and 22% of the locations of the Lower Chiquita Canyon population would be conserved. In the East Talega <i>important population</i> , 100% of individuals and locations would be conserved.	47,458 individuals (74%) and 264 locations (68%) would be conserved. Of the <i>major populations/key locations</i> , 93% of individuals and 83% of locations of the Chiquadora Ridge population, 88% of individuals and 89% of locations of the Cristianitos population, 100% of individuals and locations of the Upper Gabino/La Paz Canyon population, and 4% of individuals and 5% of locations of the Gobernadora population would be conserved. Of the <i>important populations/key locations</i> , 100% of the Chiquita Ridge individuals/locations, 88% of the individuals and 67% of the locations in the Upper Gobernadora population, and <1% of the individuals and 2% of the locations of the Lower Chiquita Canyon population would be conserved. In the East Talega <i>important population</i> , 100% of individuals and locations would be conserved.
Mud Nama <i>Nama stenocarpum</i>	2 of 4 populations totaling 850 individuals (8%) on Chiquita Ridge and along Radio Tower Road would be conserved. The two largest populations of 7,500 and 2,000 individuals each are located in the eastern portion of the Trampas Canyon development area.	2 of 4 populations totaling 850 individuals (8%) on Chiquita Ridge and along Radio Tower Road would be conserved. The two largest populations of 7,500 and 2,000 individuals each are located in the eastern portion of the Trampas Canyon development area.	2 of 4 populations totaling 850 individuals (8%) on Chiquita Ridge and along Radio Tower Road would be conserved. The two largest populations of 7,500 and 2,000 individuals each are located in the eastern portion of the Trampas Canyon development area.
Salt Spring Checkerbloom <i>Sidalcea neomexicana</i>	The two <i>important populations</i> totaling 1,500 individuals in the slope wetlands in Lower Chiquita Canyon would be conserved. The small population in the slope wetland in Gobernadora would be impacted.	The two <i>important populations</i> totaling 1,500 individuals in the slope wetlands in Lower Chiquita Canyon would be conserved. The small population in the slope wetland in Gobernadora would be impacted.	One of the three locations and 965 individuals (64%) would be conserved.
Southern Tarplant [†] <i>Centromadia parryi</i> var. <i>australis</i>	142,570 individuals (100%) and 37 locations (100%) would be conserved.	118,195 individuals (83%) and 26 locations (70%) would be conserved. Approximately 96,113 individuals (81%) and 27 locations (77%) of the <i>major population/key location</i> in Middle Chiquita and 3,122 individuals (83%) and 3 locations (60%) in the <i>important population/key location</i> north of the treatment plant would be conserved. The	133,290 individuals (93%) and 29 locations (78%) would be conserved. 100% of the Gobernadora Creek <i>major population/key location</i> would be conserved. 84% of locations and 92% of individuals in the Chiquita Canyon/Narrows <i>major population/key location</i> would be conserved. 100% of the Tesoro

TABLE 8-3
CONSERVATION ANALYSIS OF PLANNING SPECIES UNDER THE 'B' ALTERNATIVES

PLANNING SPECIES	B-8	B-10M	B-12
		<i>major populations/key locations</i> in Lower Chiquita Canyon (the Tesoro mitigation site) and Gobernadora (GERA) would be conserved.	mitigation site <i>major population/key location</i> would be conserved. 40% of locations and 17% of individuals in the Middle Chiquita north of the treatment plant <i>important population/key location</i> would be conserved (the remainder of this population is in existing orchard).

¹ The total locations and individuals for southern tarplant exclude 3 locations and 3,105 individuals in the database that are mapped in existing orchard. In addition, for general comparative purposes the conservation estimates in this table are based on a gross GIS analysis of the locations and individuals conserved and impacted and do not reflect the more detailed analysis of location-by-location viability presented in *Chapter 13* for the Habitat Reserve Alternative carried forward for detailed analysis. Any differences in the conservation/impact estimates in *Chapter 13* are a result of this more detailed analysis.